

# OFFICE OF CERTIFICATION POLICY AND EVALUATION

## CDFI CERTIFICATION APPLICATION

GUIDANCE MANUAL  
UPDATED JULY 2025

[WWW.CDFIFUND.GOV/CDFICERT](http://WWW.CDFIFUND.GOV/CDFICERT)



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### **Paperwork Burden Statement:**

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid Office of Management and Budget (OMB) Approval Number. This form's Approval Number is OMB1559-0028. Public reporting burden for this collection of information is estimated to average 55 hours per response, including time for reviewing instructions, searching existing data sources, gathering, maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Community Development Financial Institutions Fund, 1500 Pennsylvania Ave., NW, Washington, DC 20220.

The CDFI Fund reserves the right to publish responses to select questions provided during the reporting process. This information may include, but may not be limited to organization name, date certified, financial institution type, organization's address, and organization's website.

All materials are available on the CDFI Fund website: [www.cdfifund.gov](http://www.cdfifund.gov).

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# INTRODUCTION

[CDFI Fund Mission](#)

[About the CDFI Certification](#)

[Investigations/Prosecutions/Freedom of Information Act/](#)

[CDFI Fund Public Website](#)

[CDFI Fund Contact Information](#)

# 1. INTRODUCTION

## 1.1. CDFI Fund Mission

The mission of the Community Development Financial Institutions Fund (CDFI) is to expand economic opportunities for underserved people and communities by supporting the growth and capacity of a national network of community development lenders, investors, and Financial Service providers.

## 1.2. About the CDFI Certification

“CDFI Certification” or “CDFI Certified” is the official U.S. Department of the Treasury designation issued by the CDFI Fund to entities that specialize in providing financing to communities and populations identified by the CDFI Fund that lack adequate access to capital or financial services with an intent to promote economic, housing, or social opportunity.

CDFI Certification does not constitute an opinion by the CDFI Fund as to the effectiveness or financial viability of an entity. The questions in this Application are based on existing laws, regulations, and CDFI Fund Policy.

CDFI Certification is not meant to help entities become CDFI(s). Instead, it is conferred on entities that are already engaging in community development finance and can demonstrate that they are meeting all requirements in accordance with CDFI-related standards established by the CDFI Fund.

An entity may apply for CDFI Certification regardless of whether it is seeking funding from the CDFI Fund.

## 1.3. Investigations/Prosecutions/Freedom of Information Act/ CDFI Fund Public Website

The CDFI Fund, may upon request, provide any organizational information or data, collected in AMIS or otherwise provided to the CDFI Fund (e.g., CDFI Certification Application, CDFI Certification Target Market Application, Annual Certification Report, Transaction Level Report, periodic requests for additional information) to a federal, State, tribal, local, international, or foreign law enforcement agency or other appropriate authority charged with investigating or prosecuting a violation or enforcing or implementing a law, rule, regulation, or order.

Additionally, except for personally identifiable information (PII), information submitted to the CDFI Fund, including but not limited to the CDFI Certification Application and attachments, may be posted to the CDFI Fund’s public website, shared with other federal agencies, or accessed in connection with the Freedom of Information Act (FOIA; see 5 U.S.C. 552).

## 1.4. CDFI Fund Contact Information

Area	Website/Topic	Phone	Email
<b>System for Awards Management (SAM)</b>	<a href="http://www.sam.gov">www.sam.gov</a>	(866) 606-8220	See website
<b>CDFI Certification</b>	Application questions	(202) 653-0423	Submit a Service Request in AMIS (preferred) or email OCPECert@cdfi.treas.gov
<b>Abbreviated TLR (Non-CDFI Fund Award Recipients or CDFI Fund Award Recipients whose Award does not have a TLR reporting requirement only)</b>	Abbreviated TLR-related questions	(202) 653-0423	Submit a Service Request in AMIS (preferred) or email OCPECert@cdfi.treas.gov
<b>Long Form TLR (CDFI Fund Award Recipients whose Award has a TLR reporting requirement only)</b>	Long form TLR-related questions	(202) 653-0423	Submit a Service Request in AMIS (preferred) or email CDFI-Financial Strategies andResearch@cdfi.treas.gov
<b>IT Support</b>	Technical issues related to AMIS and CIMS	(202) 653-0422	Submit a Service Request in AMIS (preferred) or email AMIS@cdfi.treas.gov

# ABOUT THE CDFI CERTIFICATION APPLICATION SUPPLEMENTAL GUIDANCE

[About the CDFI Certification Application Supplemental Guidance](#)

[CDFI Certification Requirements](#)

[Conventions](#)

## 2. ABOUT THE CDFI CERTIFICATION APPLICATION SUPPLEMENTAL GUIDANCE

### 2.1. Purpose

The CDFI Certification Application Supplemental Guidance provides Applicants with instructions on how to provide information in connection with CDFI Certification Application questions, data points, related records, and required attachments. This guidance is intended to be used in conjunction with additional CDFI Certification Application materials, all of which are available on the [CDFI Fund's website](#).

This guidance document is a reference tool only. Applicants must enter their responses to the CDFI Certification Application-related questions and data input fields in the CDFI Certification Application form in AMIS or in related AMIS records. Attachments must also be provided in the CDFI Certification Application form in AMIS or in related AMIS records, as instructed.



**CDFI Fund's Awards Management Information System (AMIS):** This guidance document does not contain detailed instructions on the technical aspects of creating, navigating through, or entering information into AMIS or CDFI Certification-related AMIS forms/records. For technical instructions on how to use AMIS, please refer to the general AMIS guidance materials, particularly the [CDFI Certification Application AMIS Submission Guide](#).

### 2.2. CDFI Certification Requirements

Refer to [CDFI Certification Requirements](#) for an overview of the CDFI Certification requirements.

### 2.3. Conventions

The following conventions are used in the CDFI Certification Application Supplemental Guidance to aid navigating the document and provide clarification.

#### 2.3.1. Hyperlinks

Hyperlinks are denoted by [blue underlined text](#).

#### 2.3.2. Information Boxes

**Warning:** Provides information that warns the Applicant about potential problems and how to respond properly.



**Note:** Indicates essential information for the Applicant.

<b>NOTE</b>	
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**CLARIFYING UPDATE 07/05/2025:** Indicates sections that the Applicant should direct their attention to because of certain non-substantive revisions, clarifications, and additional context compared to the prior version of the guidance document.

**Collective Review:** Refers to the Collective Review process.

	<b><i>Collective Review</i></b>

### 2.3.3. Section Color Key

To improve navigation in the [CDFI Certification Instructions](#), each section is identified with the following colors:

<b>Section Zero</b>
<b>Financial Products and Services</b>
<b>Primary Mission</b>
<b>Target Market</b>
<b>Accountability</b>
<b>Native American CDFI Designation</b>
<b>Basic Information</b>
<b>Legal Entity</b>
<b>Financing Entity</b>
<b>Development Services</b>

**Non-Government Entity**

### 2.3.4. Application Data Field Tables

Data fields that must be completed to submit a CDFI Certification Application, along with information or instructions on how to complete them, can be found in the following data field tables in this document:

**Question Instructions:** Instructions regarding a specific question according to the answer provided. This field is shaded *orange*.

If the Applicant answered "Yes," complete OD01.1 through OD01.8. (Section 5.1.2-OD01)¶ If "No," skip to OD02.¶			
<b>Field</b> ¶	<b>OD02</b> ¶	<b>Field Type</b> ¶	<b>Picklist</b> ¶
<b>Field Label/Question Text</b> ¶	Does the Applicant want to propose an amended responsible financing practice standard?¶		
<b>Response</b> ¶	Yes or No¶		
<b>Response Instruction(s)</b> ¶			
Are there financing activities in which the Applicant seeks to engage that do not meet the standards for responsible financing practices set forth by the CDFI Fund?¶ The Applicant will need to present one proposed amended standard at a time.¶			

**Field:** Identifies the section and question number in the Application. It is labeled with the correspondent Application question number in **bold**.

**AMIS Generated Questions:** Where applicable, the field is not labeled with a question number. Rather, it is labeled **AMIS** and shaded light grey to indicate that it is linked to an auxiliary record in the Applicant’s AMIS account.

<b>Field</b>	<b>AMIS</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Board record purpose		
<b>Response</b>	Select one: <ul style="list-style-type: none"> <li>CDE Certification.</li> <li>CDFI Certification – own certification.</li> <li>Native American CDFI designation.</li> <li>CDFI Certification – collective review for another entity – Accountability self-provided.</li> </ul>		

**Field Type:** Identifies the form of the response in a particular data field will take. It is shaded *green*.

<b>Field</b>	<b>BI-A02</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Affiliate – EIN		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		

**Field Label/Question Text:** Identifies the data field label indicating the information needed or the specific question that requires a response.

Where applicable, the field is shaded to indicate that it has a relationship with another area of the Application. The color corresponds to the respective color of an [Application section](#) in the Guidance document.

<b>Field</b>		<b>Field Type</b>	Look-up
<b>Field Label/Question Text</b>	Native American CDFI – board(s) to demonstrate Applicant’s Native American CDFI Accountability		
<b>Response</b>	Select Board Name from AMIS Board Record.		

**Collective Review Related Field Label/Question Text:** Where applicable, the field is shaded *pink* to indicate that it is part of the Collective Review process.

<b>Field</b>	<b>AC01.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	CDFI Certification – Collective Review - Is there an Affiliate(s) or other entity(ies) relevant to the Applicant’s CDFI Certification collective review process?		
<b>Response</b>	Yes or <u>No</u>		

**Response:** Identifies the type of answer needed or answer options that must be used to respond to the Field Label/Question.

<b>Field</b>	<b>BI-A02</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Affiliate – EIN		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		
<b>Response Instruction(s)</b>			
<p>The EIN for the identified Affiliate or other entity relevant to the Applicant’s CDFI Certification review will auto-populate.</p> <p>While the label for this data field indicates it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p>			

**Response Instruction(s):** Provides specific information or guidance on how to respond to the Field Label/Question. The guidance must be followed to conduct accurate analysis, provide the proper attachments, or enter the appropriate response to correctly complete a data field. This field is shaded blue.

<b>Field</b>	<b>BI-A02</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Affiliate – EIN		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		
<b>Response Instruction(s)</b>			
<p>The EIN for the identified Affiliate or other entity relevant to the Applicant’s CDFI Certification review will auto-populate.</p> <p>While the label for this data field indicates it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p>			

# CDFI CERTIFICATION APPLICATION

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## 3. CDFI CERTIFICATION APPLICATION

### 3.1. Application Components

Application Component	Submission Method	Required?
<b>SAM registration</b>	Submit via SAM.gov	Required for all Applicants.
<b>Transaction Level Report (TLR)</b>	Submit electronically via AMIS	Required for all Applicants.
<b>CDFI Certification Application</b>	Submit electronically via AMIS	Required for all Applicants.
<b>CDFI Certification Organization Board Records</b>	Create/save AMIS board, board member, and accountable board member records	Required for all Applicants.
<b>CDFI Certification Market record(s) (formerly Target Market record)</b>	Create/save CDFI Certification Market record(s) in AMIS	Required for all Applicants.
<b>CDFI Information Mapping System (CIMS) customized Investment Area map(s)</b>	Create/save map(s) in CIMS in AMIS	Required for Applicants presenting an Application involving any customized Investment Area Target Market component(s) or Other Targeted Population (OTP) that is not currently approved and that is not proposed to be served in all U.S. states, U.S. territories, and the District of Columbia.
<b>CIMS map(s) for Accountability</b>	Create/save map(s) in CIMS in AMIS	Required for Applicants presenting an Application involving board members with certain sources of Accountability.
<b>CIMS map(s) for new Targeted Population(s) request</b>	Create/save map(s) in CIMS in AMIS	Required for Applicants requesting determination of a new Targeted Population(s) via a Section Zero request.

## 3.2. Application Fields

The CDFI Certification Application fields are as follows:

- **Attachment:** These fields allow for the upload of documents that support the requirement (e.g., community development strategy, advisory board policy).
- **Auto Populated:** These fields will be automatically populated in AMIS based on other data inputs. No data entry is required for fields that are marked “Auto Populated,” but Applicants should review these fields, including auto-calculated fields, for accuracy.
- **Currency:** These fields allow the Applicant to enter currency data points and have a dollar sign in front. For example, the Applicant’s total amount of available assets/asset amount dedicated to a particular activity as of the last day of its current fiscal year/asset amounts dedicated to date is \$200,000.00.
- **Date:** Fields that request dates will display a calendar for the Applicant to select the related month, day, and year or the Applicant can enter the month, day, and year into the data field directly.
- **Look-up:** These fields allow the Applicant to search and select from existing data in AMIS. For example, when entering board(s), the Applicant can “look-up” the board(s) being presented as its means of Accountability.
- **Numeric:** These fields allow the Applicant to enter a number (that is not a dollar figure or a percentage). For example, the number of staff time hours available to the Applicant overall/dedicated to a particular activity during a typical week during the last 12 calendar months is 100.
- **Percentage:** These fields allow the Applicant to enter a percentage. For example, the current highest Annual Percentage Rate (APR) charged on any small business loan is 37%. Percentages (e.g., percentage of staff time dedicated to eligible Financial Products or eligible Financial Services activity, percentage of eligible Financial Products activity that is Target Market-directed) will not round to the nearest whole number and may display two or more decimals.
- **Picklist:** These fields allow the Applicant to select one or more options from a suite of choices (e.g., a dropdown of “Yes” or “No”).
- **Text or Narrative:** These fields allow the Applicant to enter text and can include numeric characters. They are used for names and narrative responses. These fields will typically have character limits.

### 3.3. Awards Management Information System Account Requirement

Entities seeking to be certified by the Community Development Financial Institutions Fund (CDFI Fund) as Community Development Financial Institutions (CDFI[s]) must submit a CDFI Certification Application in the CDFI Fund’s interactive online portal, the Awards Management Information System (AMIS).

To access and complete a CDFI Certification Application, Applicants must have an AMIS account with active organization contacts. For information on how to create and maintain an AMIS account, please refer to [AE101: Getting Started Navigating AMIS](#). Review the [AMIS Training Manual](#) for instructions on navigating or modifying an account. See “[AMIS Training Materials](#)” for additional information.

### 3.4. Compliance with CDFI Certification Requirements

CDFI Certification Applications are evaluated for compliance with all CDFI Certification requirements as of the date of submission of the CDFI Certification Application. Unless the CDFI Fund asks for clarifying information, if compliance with all CDFI Certification requirements is not demonstrated as of the CDFI Certification Application submission date, the Application will be declined. Upon submission of the CDFI Certification Application, the Applicant’s contacts identified in AMIS will receive notification that the Application has been received. Any CDFI Certification Application not submitted in AMIS by the required deadline, if applicable, will be automatically given a status of “Abandoned” rather than “In Progress.”



#### **[CLARIFYING UPDATE 07/05/2025]**

CDFI Certification Applicants must follow the detailed CDFI Certification Application instructions provided in this manual.

The CDFI Fund will periodically update this CDFI Certification Application Guidance document. Applications (including all supporting documents and associated AMIS records) must reflect the guidance provided in the version of this document if made publicly available at least ten (10) days prior to the Application submission date.

The CDFI Fund expects Applicants to fully review their Application for completeness, accuracy, and validity prior to submission. Due to its reliance on an older version of the CDFI Certification Application Guidance, an Entity may have its Application declined due to missing information, extraneous information, or for not demonstrating compliance with the substantive CDFI Certification requirements. As long as an updated version of the CDFI Certification Application Guidance is publicly available at least 10 days prior to the date that a CDFI Certification Application is submitted, Applicants will be held to the standards in the latest version of the Guidance. Failure to rely on the latest Guidance, may result in the need to submit a new CDFI Certification Application.

<b>NOTE</b>	<ul style="list-style-type: none"> <li>• Entities must maintain records to demonstrate the validity of all information provided in the CDFI Certification Application. Entities must also maintain records to demonstrate full compliance with all applicable CDFI Certification and CDFI Certification Application requirements. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification document retention policy, request documentation, records, or other information related to an entity’s CDFI Certification Application at any time within five years after it has been submitted, including during the Application review process.</li> <li>• CDFI Certification Applications cannot be reopened for modification after submission in AMIS.</li> <li>• CDFI Certification Applications may be declined due to inconsistencies between an entity’s name in the Application versus the name that appears in any required supporting documents for that entity.</li> </ul>
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### 3.5. How to Complete the CDFI Certification Application

Fulfil the following steps to complete the CDFI Certification application.


#### 3.5.1. Prepare for CDFI Certification

The Applicant takes the following steps before submitting a CDFI Certification Application.

- (1) Review the Certification as a Community Development Financial Institution and Definitions sections of the CDFI Program Revised Interim Regulations, 12 CFR 1805, available on the Code of Federal Regulations website at [ecfr.gov](http://ecfr.gov).

<b>NOTE</b>	<p>Capitalized words or phrases throughout the CDFI Certification Application are defined terms that can be found in the CDFI Program Revised Interim Regulations, the Community Development Banking and Financial Institutions Act of 1994 (12 U.S.C. 4701 et seq.), or the most recent CDFI Fund Community Development Financial Institutions Program (CDFI Program) Notice of Funds Availability (NOFA) which includes the Native American CDFI Assistance (NACA) Program or in the CDFI Certification guidance. Review the CDFI Certification Application and CDFI Certification Application guidance materials provided on the CDFI Fund’s <a href="#">CDFI Certification</a> web page.</p>
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- (2) Create or access an existing [System for Award Management](#) (SAM) account to obtain or verify a Unique Entity ID (UEI) and complete a SAM registration. If necessary, update the Applicant’s SAM information.

	<p><b>Collective Review</b></p>
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If applicable, update SAM information for each entity relevant to its CDFI Certification review (e.g., each Affiliate relevant to the Primary Mission review or each entity relevant to the CDFI Certification collective review process).

<b>NOTE</b>	Questions about SAM registration or the UEI should be directed to SAM.gov via contact information identified at the <a href="https://sam.gov">SAM.gov</a> website. The CDFI Fund does not manage SAM.gov and is unable to respond to any questions related to that system.
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- (3) Create or access an Applicant account in AMIS. Review and update data fields on the Organization page using the AMIS [guidance materials](#) located on the CDFI Fund’s webpage.

	<b>Collective Review</b>
If applicable, create or access an existing account in AMIS for each entity relevant to the Applicant’s CDFI Certification collective review process or review and, if needed, update an existing account using the AMIS <a href="#">guidance materials</a> located on the CDFI Fund’s webpage.	

- (4) Verify the Employer Identification Number (EIN) for the Applicant via its Organization page in AMIS. If applicable, for each other entity relevant to its CDFI Certification review (e.g., each Affiliate relevant to the Primary Mission review or each entity relevant to the CDFI Certification collective review process) via the relevant Organization page or Affiliate record in AMIS.


	<b>Collective Review</b>
If applicable, verify the EIN for each entity relevant to the Applicant’s CDFI Certification collective review process via the relevant Organization page or Affiliate record in AMIS.	

<b>NOTE</b>	Each CDFI Certification Applicant must be the primary holder of its own valid EIN and be a legal entity when it submits the CDFI Certification Application. The Applicant’s name and EIN in AMIS must match its name and EIN in SAM.
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- (5) Verify the Applicant’s contact information on the Organization page in its AMIS. At least one authorized representative must be identified in order to submit a completed CDFI Certification Application. Anyone listed as a contact in the Applicant’s online account can fill out the CDFI Certification Application. However, only a contact designated as an Authorized Representative is able to make submissions.

<b>NOTE</b>	An Authorized Representative must be a person who is authorized to act and legally bind on behalf of the Applicant. Consultants cannot be identified as an Authorized Representative.
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- (6) Set email systems and firewalls to accept messages generated by AMIS. Contact the AMIS Help Desk via an AMIS Service Request for assistance if needed.
- (7) Create a record for each Affiliate or other entity relevant to the Applicant’s CDFI Certification review (e.g., each Affiliate relevant to the Primary Mission review or each entity relevant to the CDFI Certification collective review process) in the Affiliate section of the Applicant’s AMIS account.

	<p><b>Collective Review</b></p>
<p>Create a record for each Affiliate or other entity relevant to the Applicant’s CDFI Certification collective review process in the Affiliate section of the Applicant’s AMIS account.</p>	


- (8) Review the CDFI Fund’s CDFI Certification-related lists of eligible Financial Products, eligible Financial Services, disregarded and qualified assets/staff time, eligible Targeted Populations, and eligible CDFI Certification Target Market Assessment Methodologies, as well as the list of ineligible financing practices. Prior to submitting the Application, Applicants must indicate whether they are requesting an eligibility determination for any changes in connection with these standards for CDFI Certification purposes. If any requested similar financial product, similar financial service, financing practice, asset/staff time, Targeted Population, or CDFI Certification Target Market Assessment Methodology is deemed ineligible by the CDFI Fund for the requested purpose, the Applicant is prohibited from presenting that information in the CDFI Certification Application in the manner requested. See [“Obtaining CDFI Certification-related determinations on new Financial Products type\(s\), new Financial Services type\(s\), amended responsible financing practice\(s\), new disregarded or included major use\(s\) of assets/staff time, new Targeted Population\(s\), and new/amended CDFI Certification Target Market Assessment Methodology\(ies\).”](#)
- (9) Upload or enter transactional data to the Transaction Level Report (TLR) collection tool that supports the proposed Target Market criteria (for Investment Areas, using the eligible American Community Survey [ACS] dataset approved by the CDFI Fund) for the most recently completed fiscal year as of the date the CDFI Certification Application is submitted, either in connection with active CDFI/NACA Program funding or, if there is no active CDFI/NACA Program funding, via an abbreviated CDFI Certification-related TLR.
- (10) Create CDFI Certification market, board, board member, and accountable board member records in the Applicant’s AMIS account. If applicable, create board, board member, and accountable board member records in the Applicant’s AMIS account to demonstrate accountability in connection with the Native American CDFI designation.

	<p><b>Collective Review</b></p>
<p>As applicable, create CDFI Certification market, board member, and accountable board member records in the AMIS account for each entity relevant to the Applicant’s CDFI Certification collective review process.</p>	


- (11) If required, create a map in the CDFI Information Mapping System (CIMS).
  - a) If required, create a Customized Investment Area or Other-OTP Target Market map(s) for the Applicant or, as applicable, for each pertinent entity relevant to the Applicant’s CDFI Certification collective review process (see the [guidance materials](#) for CIMS). If an AMIS map is not created, or the analysis demonstrates that the geography is not eligible, the respective Target Market will not be approved.

	<b>Collective Review</b>
<p>As applicable, create a Customized Investment Area or Other-OTP Target Market map(s) for each pertinent entity relevant to the Applicant’s CDFI Certification collective review process (see the <a href="#">guidance materials</a> for CIMS). If an AMIS map is not created, or the analysis demonstrates that the geography is not eligible, the respective Target Market will not be approved.</p>	

- b) If required, create a map(s) using CIMS to demonstrate accountability via certain sources of Accountability for the Applicant or, as applicable, create a map(s) using CIMS to demonstrate accountability via certain sources of Accountability.

	<b>Collective Review</b>
<p>As applicable, create a map(s) using CIMS to demonstrate accountability via certain sources of Accountability create a map(s) using CIMS to demonstrate accountability via certain sources of Accountability.</p>	


- (12) Complete and submit the full CDFI Certification Application in AMIS (including certifying the Applicant’s TLR or, if applicable based on the Applicant’s chosen method of meeting the CDFI Certification Target Market benchmark requirements, applicable eligible Financial Services activity). Upon submission of the CDFI Certification Application, the “Point of Contact” identified in the Application will receive notification that the Application has been received.

	<b>Collective Review</b>
<p>If applicable, certify the TLR for any entity relevant to the Applicant’s CDFI Certification collective review process that engages in eligible Financial Products activity.</p>	

<b>NOTE</b>	<p>Although the CDFI Certification Application allows for the data fields to be responded to in any order, it is strongly encouraged that the data fields be completed in the order in which they are presented because responses in certain fields may trigger or disable dependent fields or sections or subsections later in the Application.</p> <ul style="list-style-type: none"> <li>• CDFI Certification Applications cannot be reopened for modification by the Applicant after submission in AMIS.</li> <li>• CDFI Certification Applications that are incomplete, or contain inaccurate, incorrect, or invalid information will be rejected. The CDFI Fund expects Applicants to fully review their Applications for completeness, accuracy, and validity prior to submission. Entities whose CDFI Certification Applications are rejected for missing, inaccurate, or invalid information will be required to submit a new Application if they wish to reapply.</li> <li>• CDFI Certification Applications may be rejected if there are inconsistencies between the Applicant’s name in the Application form and any required documents.</li> <li>• CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</li> </ul>
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**Mergers and Acquisitions Finalized After Application Submission, but Prior to the Application’s Final Determination**

Applicants that acquire, are acquired by or merge with other entity(ies) after the CDFI Certification Application has been submitted, but before the review has been completed, must report the event to the CDFI Fund. CDFI Certification Applications from such Applicants cannot be approved, regardless of whether the Applicant is a surviving entity or whether the merger or acquisition is considered a material change. In such cases, the Applicant or, if applicable, the surviving entity must submit a new CDFI Certification Application after the merger or acquisition has been finalized.

	<p><b><i>Collective Review</i></b></p>
<p>If applicable, Applicants with an entity relevant to their CDFI Certification collective review process that acquire, are acquired by or merge with other entity(ies) after the CDFI Certification Application has been submitted, but before the review has been completed, must report the event to the CDFI Fund. CDFI Certification Applications from such Applicants cannot be approved, regardless of whether the Applicant is a surviving entity or whether the merger or acquisition is considered a material change. In such cases, the Applicant or, if applicable, the surviving entity must submit a new CDFI Certification Application after the merger or acquisition has been finalized.</p>	

(13) Receive CDFI Certification Application determination letter.

(14) If declined for CDFI Certification, review the decline determination letter and, if desired, request a debriefing from the CDFI Fund on the decline decision.

- a) If an entity’s CDFI Certification Application is declined, a determination letter will be sent to the Authorized Representative and the point of contact identified in the Application via email. Applicants who receive denials can request a debriefing through the submission of a Service Request via AMIS. New CDFI Certification Applications can be submitted with or without a debriefing.
- (15) If approved for CDFI Certification, receive the CDFI Certification Agreement and a Certified CDFI Logo toolkit and sign the CDFI Certification Agreement.
- a) If an entity’s CDFI Certification Application is approved, a CDFI Certification Agreement and a Certified CDFI Logo toolkit will be sent to the Authorized Representative and point of contact(s) identified in the AMIS Application via email. An authorized representative must electronically review, sign, and return the CDFI Certification Agreement to the CDFI Fund via AMIS within 30 business days. A copy of the fully executed Agreement will be made available in the Certified CDFI’s AMIS account.
  - b) When the CDFI Certification Agreement is signed: (1) the Certification shall be administered pursuant to the General Terms and Conditions; and (2) the CDFI Certification shall be subject to further provisions, terms, conditions, requirements, certifications, and representations that are set forth in additional schedules that will be attached and become a material part of the agreement.

<b>NOTE</b>	<ul style="list-style-type: none"> <li>• Upon designation as a Certified CDFI, certain organizational information about the Applicant and its activities may be posted on the CDFI Fund’s public website for the purpose of creating a public list and description of Certified CDFIs. A copy of the CDFI Certification Agreement template can be found on the CDFI Fund website.</li> <li>• Upon designation as a Certified CDFI, the CDFI will be required to meet annual reporting requirements through the submission of an Annual Certification and Data Collection Report (ACR) and TLR, no later than 180 days after its fiscal year end or as requested by the CDFI Fund.</li> <li>• Upon designation as a Certified CDFI, the Certified CDFI shall maintain all CDFI Certification-related records and documentation supporting the data reported to the CDFI Fund, including supporting documents related to the initial CDFI Certification Application, for a minimum of five years after submission of the document(s) or record(s) to the CDFI Fund. Under 12 CFR 1805.201(c), the CDFI Fund will review a Certified CDFI's CDFI Certification status, as deemed appropriate, to ensure that it continues to meet the CDFI Certification requirements, as well as review the Certified CDFI’s organizational capacity, lending activity, community impacts, and such other information that the CDFI Fund deems appropriate. Access to Applicant or Certified CDFI records shall also be maintained in accordance with the Freedom of Information Act (5 U.S.C. 552; FOIA).</li> </ul>
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### 3.5.2. Submit a CDFI Certification Application

The Applicant takes the following steps to submit a CDFI Certification Application.

**[CLARIFYING UPDATE 07/05/2025]**

- (1) Launch CDFI Certification – Section Zero.

Launch the CDFI Certification Application – Section Zero and respond to the questions regarding [“Obtaining CDFI Certification-related determinations on new Financial Products type\(s\), new financial services type\(s\), amended responsible financing practice\(s\), new disregarded or included major use\(s\) of assets/staff time, new Targeted Population\(s\), and new/amended CDFI Certification Target Market Assessment Methodology\(ies\)”](#) for the primary entity under review or any entity relevant to the CDFI Certification collective review process that might need or want a determination.

If a response to any question in Section Zero indicates that a determination(s) is needed to meet the CDFI Certification requirements, the Applicant assesses whether the CDFI Certification requirements can be met without the CDFI Fund’s approval of determinations.

- a) If an assessment is made that the Applicant can meet the CDFI Certification requirements without any determination being approved by the CDFI Fund, it may elect to proceed with the CDFI Certification Application without indicating a needed determination.
- b) The CDFI Certification Application will not launch if responses in Section Zero indicate the Applicant needs a determination.

(2) Complete the appropriate Transaction Level Report (TLR).

Upload or enter transaction data to a TLR for the Applicant (unless the Applicant is a DIHC that does not engage in any eligible Financial Products activity nor, if applicable based on the Applicant’s chosen method of meeting the CDFI Certification Target Market benchmark requirements, offer any applicable eligible Financial Services [i.e., eligible deposit accounts]).

- a) Do not certify the TLR(s) as final unless confident that ALL eligible Financial Products activity closed during the most recently completed fiscal year and, if applicable, all relevant deposit account information has been uploaded/entered and is valid (including that it reflects most recently completed fiscal year information) and the Applicant is ready to proceed with the full CDFI Certification Application. Once a TLR is certified, transactions will no longer be able to be uploaded/entered or edited by the Applicant unless a Service Request is submitted in AMIS asking for the TLR to be reopened. Once a CDFI Certification Application is submitted in AMIS, no further changes can be made to the TLR submitted in conjunction with that CDFI Certification Application.
- b) Run the Target Market Calculator to determine if the CDFI Certification Target Market benchmark requirements are met.
- c) An Applicant will not be able to submit the CDFI Certification Application if the Target Market benchmarks are not met.

(3) Apply for CDFI Certification.

Complete all required sections of the Application. If, at the time the CDFI Certification Application is submitted, the data in a certified TLR intended to be used for CDFI Certification Application purposes no longer reflects the actual most recently completed fiscal year information, do not submit the CDFI Certification Application. Contact the CDFI Fund’s Office of Certification Policy and Evaluation (OCPE) for assistance via a Service Request in AMIS.

### 3.6. Attestation and Submission



Before you submit your CDFI Certification Application, the CDFI Fund recommends that you closely review all responses within the Application and related tools. Once submitted, the Application will be locked and responses cannot be altered.

Before proceeding to the Attestation and Submission section, make sure that the Application is complete, all narratives and data have been entered, and that all required attachments have been uploaded and attached to the Application.

Each Application must be signed by a designated Authorized Representative in AMIS before it can be submitted. Applicants must ensure that an Authorized Representative is an employee or officer of the Applicant and is authorized to sign legal documents on behalf of the organization and bind the organization accordingly. Consultants working on behalf of the organization cannot be designated as Authorized Representatives and may not sign the Application.

An Authorized Representative signs the Application by checking the box located in the “*Attestation and Submission*” tab. The Authorized Representative must be logged in to AMIS to complete this action. Please read the attestation before signing the Application. The name of the Authorized Representative who signs the Application and the date and time they signed the Application will automatically appear after the signature attestation box is checked. Please note that an Authorized Representative can sign the Application at any time prior to submitting the Application. Signing the Application does not submit the Application.

#### NOTE

Only a designated Authorized Representative or an Application Point of Contact, as designated in the Application, may submit the Application in AMIS. Be aware of the difference between these two roles: only the Authorized Representative may sign the Application, and either the Authorized Representative or the Application Point of Contact may submit the Application.

### 3.7. Submission Deadlines

A CDFI Certification Application may be submitted to the CDFI Fund through AMIS at any time, unless otherwise directed by the CDFI Fund. Entities interested in applying to any CDFI Fund funding program for which CDFI Certification may be needed for general eligibility purposes or to access a special provision must review CDFI Certification-related deadlines in the relevant CDFI Fund program Notices of Funds Availability (NOFA[s]) or Notices of Guarantee Availability (NOGA[s]).

### 3.8. Resource Materials

Applicants are strongly encouraged to review all CDFI Certification Application resource materials available on the CDFI Fund’s website before completing and submitting a CDFI Certification Application, including the [Community Development Financial Institutions Program regulations](#) and the [Riegle Community Development and Regulatory Improvement Act of 1994](#). The CDFI Fund may add to or update the Application materials on its website from time to time. Applicants should verify that they are referring to the most up to date guidance.

# CERTIFICATION REQUIREMENTS

[CDFI Certification Requirements – General](#)

[CDFI Certification Requirements by Provisions](#)

[CDFI Certification Requirements – Collective Review](#)

[CDFI Certification Requirements – Documentation](#)

## 4. CDFI CERTIFICATION REQUIREMENTS

### 4.1. CDFI Certification Requirements – General

To be certified as a CDFI, an entity must, unless otherwise allowed in connection with certain CDFI Certification provisions, meet all of the following criteria, in some cases along with certain of its Affiliates or other related entities:

- Be a legal entity that is the primary holder of a federally issued EIN.
- Have the promotion of community development as its primary mission.
- Be a financing entity.
- Substantially serve a CDFI Certification Target Market with its eligible Financial Products and, as allowed, its eligible Financial Services activity.
- Provide eligible Development Services in conjunction with its eligible Financial Products or eligible Financial Services activity.
- Have sufficient accountability to its CDFI Certification Target Market.
- Be a non-government<sup>1</sup> entity.

#### NOTE

Details on how the CDFI Fund assesses compliance with the CDFI Certification requirements are provided in the criterion-specific sections of this guidance and other CDFI Certification guidance materials.

Upon designation as a Certified CDFI, an entity must continue to meet all CDFI Certification requirements. CDFI Certification may be revoked if the entity fails to adequately demonstrate it continues to meet CDFI Certification requirements.

#### **[CLARIFYING UPDATE 07/05/2025]**

In general, there is no specific legal structure an entity must have for CDFI Certification purposes. An entity can be nonprofit or for-profit and it can take any of the allowed legal forms (e.g., corporation, limited liability company [LLC] partnership, sole proprietorship if the sole proprietor formally elects to be treated as a corporation by the Internal Revenue Service [IRS], etc.). However, entities using the CDFI Certification solely to participate in the CDFI Fund's Bond Guarantee (BG) Program that seek to use the CDFI Certification-related BG Program provision allowing non-arm's-length Financial Products activity directed to a Controlling Certified CDFI to be used to meet the CDFI Certification requirements or the corresponding provision that allows the same for Development Services, must be limited liability companies (LLCs).

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<sup>1</sup> An entity that is Controlled by a tribal government (includes both federally and state recognized tribal governments), but not by a governmental body of the United States or any of its political subdivisions is eligible for CDFI Certification. Indian tribes are neither governmental bodies nor agencies or instrumentalities of the United States or any of its political subdivisions.

### 4.1.1. Primary Holder of a Federal Employer Identification Number (EIN)

The CDFI Certification can only be conferred on an entity that is the primary holder of a federal Employer Identification Number (EIN). If an entity does not have an EIN or it is not the primary holder of the EIN it uses (includes entities that operate as distinct entities in their own right, but are disregarded for federal tax purposes and that, therefore, share an EIN with another entity[ies]), it must obtain and maintain its status as the primary holder of its own EIN to obtain and maintain the CDFI Certification.

An entity may not seek or maintain CDFI Certification on behalf of another entity (e.g., Subsidiary, parent, yet to be established entity).

The CDFI Certification is linked to the primary EIN in connection with which it was approved and to the primary holder of that EIN.

The CDFI Certification cannot:

- Be extended to cover any entity other than the primary holder of the EIN to which it is linked, including entities that may share the relevant EIN, but are disregarded for federal tax purposes or Affiliates (such as a parent entity).
- Be transferred to an entity with a different EIN (including a successor entity formed under a new EIN).
- Be conferred on an individual(s) — only organizations can obtain and maintain the CDFI Certification.



#### **[CLARIFYING UPDATE 07/05/2025]**

If an EIN to which a CDFI Certification is linked has been cancelled or, despite it continues to exist is no longer being used in connection with ongoing activity, the CDFI Certification linked to that EIN ceases to exist.

An entity is assessed for compliance with the CDFI Certification requirements as a whole and on its own merit based on how it is delineated as an entity by its EIN. This means that all of an entity's operations and activities, including all of its eligible Financial Products or eligible Financial Services activity, associated with the relevant EIN must be presented for review in connection with its CDFI Certification assessment and only that particular entity's operations and status can be considered. An entity seeking to obtain the CDFI Certification cannot present merely a subset of its operations or activities, such as a specific office[s], branch[es], division[s], department[s], or program[s] or selected eligible Financial Products/Financial Services activity, etc., for consideration. A single entity, including those with multiple trade names/DBA(s), can typically be identified by all operations, offices, locations, branches, divisions, programs, projects, activities, etc. for the relevant entity that are associated with the relevant EIN, excluding disregarded entities that may also use that particular EIN.

- **Example:** A community action agency is the primary holder of an EIN and operates a loan fund that has its own advisory board. The loan fund, however, is not legally established as its own separate entity, nor does it operate as a separate and distinct entity. Because the loan fund is neither an independent entity nor the primary holder of its own EIN, the community action agency is the entity that can seek to obtain and maintain the CDFI Certification and it would need to meet the CDFI

Certification requirements based on the entirety of all of its operations, not just its loan fund activity.

- **Example:** An entity is the primary holder of an EIN shared with another entity(ies) under a series LLC structure. Only the entity that is the primary holder of the EIN can seek to obtain and maintain the CDFI Certification, and it would need to meet the CDFI Certification requirements based on just its own operations and status without taking into account the operations or status of the other entity(ies) in the series with which it shares its EIN.

## 4.2. CDFI Certification Requirements by Provisions

### NOTE

For details on the following requirements and provisions, please see the information and instructions for each applicable CDFI Certification criterion in the criterion-specific sections of this and other relevant CDFI Certification guidance materials.

### 4.2.1. Entities Affiliated with a Tribal Government and Tribal Governments Relevant to Another Entity's CDFI Certification Review

Entities Controlled by a tribal government (includes both federally and state recognized tribal governments), but not by a governmental body of the United States or any of its political subdivisions are eligible to apply for CDFI Certification. American Indian tribes are neither governmental bodies nor agencies or instrumentalities of the United States or any of its political subdivisions. An entity's connection to a tribal government will not affect its ability to meet the Non-Government Entity criteria.

Entities that seek to obtain or maintain CDFI Certification or that are relevant to another entity's CDFI Certification review that are Affiliated with a tribal government, must meet all applicable Primary Mission requirements; however, if a tribal government itself is relevant to another entity's CDFI Certification review (e.g., as a Controlling entity), the tribal government is not required to meet any Primary Mission requirements in connection with that other entity's CDFI Certification.

### 4.2.2. Primary Mission Requirements for Entities with an Affiliate(s)

Any entity seeking to obtain or maintain CDFI Certification that has an Affiliate(s) must not only demonstrate its own compliance with the standard CDFI Certification Primary Mission requirements as the primary entity under review for CDFI Certification purposes, but must also demonstrate that each Affiliate, other than a tribal government, that Controls it or that engages in eligible Financial Products or eligible Financial Services activity meets the following Primary Mission-related requirements<sup>2</sup>:

- It currently has a governing leadership-approved mission that supports or is consistent with the primary entity under review's primary mission of promoting community development;

<sup>2</sup> The intent of this provision is to limit access to the benefits of CDFI Certification by organizations with missions or activities that do not demonstrate broader alignment with the goals of the statute.

- Its activities support or are consistent with the community development mission of the primary entity under review; and
- If it engages in eligible Financial Products or eligible Financial Services activity, that activity meets the CDFI Certification Primary Mission-related responsible financing practices standards.

**[CLARIFYING UPDATE 07/05/2025]**


Affiliates that are separately Certified CDFIs or Community Development Entities (CDEs), as well as Affiliates whose sole activity is the participation in other federal financing programs are presumed to meet the CDFI Certification primary mission requirements.

<b>NOTE</b>	Confirmation of an entity’s line of business, as evidenced by its organizing documents, is subject to review during CDFI Certification compliance checks. Affiliates that engage in additional activities other than the administration of another federal financing program is not covered by this exemption.
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If a covered Affiliate is not a Certified CDFI or Certified CDE, it is not required to have a mission of promoting community development in place for the purposes of CDFI Certification. However, a covered Affiliate must demonstrate that it has a mission currently in place that supports and/or is consistent with that of the Applicant’s.

### 4.2.3. Financing Entity Requirements for Depository Institution Holding Companies, Insured Depository Institutions, Insured Credit Unions, and State-Insured Credit Unions

DIHC(s), IDI(s), Insured Credit Unions, and State-Insured Credit Unions are presumed to meet the CDFI Certification Financing Entity requirements, provided they have been engaged in eligible financing for at least one full 12-month fiscal year (for CDFI Certification Applicants, this must be the most recently completed full 12-month fiscal year prior to submission of the Application).

	<b>Collective Review</b>
DIHC(s) that do not engage in their own direct eligible Financial Products or eligible Financial Services activity will be deemed as meeting the requirement of having been engaged in eligible financing for at least one full 12 month fiscal year as long as at least one entity relevant to their CDFI Certification collective review process meets that standard (based on the relevant related entity’s own fiscal year timeframe, even if that timeframe is different from that of the DIHC seeking to obtain or maintain CDFI Certification).	

<b>NOTE</b>	Banks/thrifts that are not FDIC-insured are not presumed to meet the Certification Financing Entity requirements and must provide all relevant information to demonstrate that they meet those standards.
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#### 4.2.4. Entities Using CDFI Certification Solely for Participation as Eligible CDFI(s) in the CDFI Fund's Bond Guarantee Program – Financing Entity and Arm's-Length Financial Products/Financial Services Activity Requirements

If an entity is seeking to obtain or maintain CDFI Certification solely for the purpose of participating in the CDFI Fund's Bond Guarantee (BG) Program and it meets the requirements of a CDFI Certification provision for such entities, it is eligible for CDFI Certification, even if it has not, as is normally required in connection with the CDFI Certification Financing Entity criterion, been engaged in closing eligible Financial Products transactions or delivering an eligible Financial Services (s) for at least one full 12 month fiscal year; or it cannot demonstrate compliance with the CDFI Certification Target Market requirements based solely on Financial Products or Financial Services activity for which it is a financing entity of record and that it offers at arm's-length, but could if allowed to include activity with a Controlling Certified CDFI.

Entities seeking to obtain or maintain CDFI Certification solely to participate as Eligible CDFI(s) in the CDFI Fund's BG Program will be:

- Considered Financing Entities, even if they cannot meet the CDFI Certification Financing Entity requirements based on their own status, if they are Controlled by at least one Certified CDFI; and they can demonstrate that either they or a Controlling Certified CDFI has been engaged in eligible financing for at least one full 12 month fiscal year (if a Controlling Certified CDFI will be used to meet the standard, the Controlling Certified CDFI's own fiscal year timeframe will be used for the test, even if that timeframe is different from that of the DIHC seeking to obtain or maintain CDFI Certification); and they meet any additional parameters and restrictions established via the applicable Notice of Guarantee Availability for the particular CDFI BG Program Application round (see 12 CFR 1805.201(b)(2)(C)(ii)).
- Allowed to meet CDFI Certification requirements using non-arm's-length-Financial Products activity for which they are named as a financing entity of record in associated transaction closing documents, non-arm's-length Financial Services activity, and non-arm's-length Development Services activity if they are Controlled by at least one Certified CDFI and if the relevant activity is directed to their Controlling Certified CDFI(s). Such activity must be pursuant to operating agreements that include management and ownership provisions and that are in a form and substance acceptable to the CDFI Fund (see CDFI Program interim regulations, 12 CFR 1805.201(b)(2)(C)(iii)).

An entity that uses a CDFI Certification provision for entities seeking to obtain or maintain CDFI Certification solely to participate in the CDFI Fund's BG Program must be able to demonstrate that an entity identified as a Controlling Certified CDFI is actually its Controlling entity.

- If an entity relying on a CDFI Certification BG Program provision will not use activity with a Controlling Certified CDFI to meet any CDFI Certification requirements, the only proof needed of the Control relationship with an entity identified as a Controlling Certified CDFI is a governing leadership-approved document evidencing that relationship.

<b>NOTE</b>	<p>Examples of documents that evidence a Control relationship between entities include, but not limit to: a) a stock summary report showing that the Controlling entity owns at least 25% of the other entity's voting shares; b) a memorandum of understanding between the two entities that addresses the Control relationship; c) a copy of the Subsidiary's governance document stating that the Controlling entity appoints a majority of the Subsidiary's governing board or indicating other forms of Control.</p> <ul style="list-style-type: none"> <li>The document must evidence governing leadership approval in a way accepted by the CDFI Fund for CDFI Certification purposes (for information on evidence of governing leadership approval accepted for CDFI Certification purposes, see the "<a href="#">Evidence That a Document Is Governing Leadership-Approved in the CDFI Certification</a>" – Documentation Requirements section of this guidance manual).</li> </ul>
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- If an entity relying on a CDFI Certification BG Program provision will use eligible activity with a Controlling Certified CDFI to meet any CDFI Certification requirements, the proof of the relationship with a Controlling Certified CDFI must, per the CDFI Program interim regulations, take the form of an operating agreement that includes management and ownership provisions and that are in a form and substance acceptable to the CDFI Fund (12 CFR 1805.201(b)(2)(C)(iii)).

An entity that uses a CDFI Certification provision for entities seeking to obtain or maintain CDFI Certification solely for the purpose of participating in the CDFI Fund's BG Program must meet all applicable CDFI Certification requirements not referenced above directly of its own accord, unless, in addition to a provision for entities seeking to obtain or maintain CDFI Certification solely for the purpose of participating in the CDFI Fund's BG Program, it also qualifies for another CDFI Certification provision that allows an alternative.



Entities that receive the CDFI Certification using a provision for participants in the BP Program will not be accepted as Certified CDFI(s) for CDFI Fund assistance programs other than the CDFI BG Program. If such an entity seeks access to other CDFI Fund assistance programs or to a special provision offered in connection with those other CDFI Fund assistance programs as a Certified CDFI, it must apply for CDFI Certification using the standard CDFI Certification Application process and demonstrate it meets all mandated requirements for CDFI Certification.

#### 4.2.5. Spin-off Entities – Primary Mission, Financing Entity, and Target Market Requirements



The CDFI Certification Spin-off provision cannot be used if the only way a Spin-off can demonstrate compliance with a CDFI Certification requirement(s) is to use the Financial Products activity or other status of an entity that was a Certified CDFI at any point during the 12 months of what would have been, if it was in existence at that time, the Spin-off's most recently completed fiscal year timeframe.

An entity that was spun off from another entity(ies) that is or was engaged in closing an arm's-length Financial Product(s) for which it is named as a financing entity of record in the associated transaction closing documents, is eligible to seek CDFI Certification even if the following applies, as is normally required in connection with the CDFI Certification Financing Entity criterion:

- It has been engaged in closing eligible Financial Product(s) transactions or delivering an eligible Financial Service(s) for at least one full 12-month fiscal year;
- It cannot demonstrate that its primary mission was the promotion of community development for at least the most recent six full calendar months; or/and
- It cannot demonstrate compliance with the CDFI Certification Target Market requirements based on its own direct eligible Financial Products and, if allowed, eligible Financial Services activity.

A Spin-off is essentially an entity that will carry on, either as a new entity or as a reconfigured previously existing entity, some or all of the eligible Financial Products activity originally undertaken by an Affiliate(s). The Spin-off will not use the eligible Financial Products activity or other status of any entity that was a Certified CDFI at any point during the 12 months of what would have been, if it existed at that time, the Spin-off's most recently completed fiscal year timeframe.

An entity using the CDFI Certification Spin-off provision does not have to meet the CDFI Certification requirements related to (1) the length of time that eligible Financial Products or eligible Financial Services activity has been underway, (2) the length of time that an acceptable primary mission of community development has been in effect, or (3) the Target Market requirements based on its own status.

An entity using the CDFI Certification Spin-off provision must meet all CDFI Certification requirements directly and of its own accord except as described above, unless, in addition to the Spin-off provision, it also qualifies for another CDFI Certification provision that allows an alternative.

An organization may choose to create a spin-off entity for the purposes of Certification when the organization's predominant activity is non-financing or non-eligible financing, and the organization is unable to meet the Financing Entity criterion for CDFI Certification. Entities seeking to participate in the CDFI Bond Guarantee Program also may create an Affiliate spin-off entity seeking a proposed Bond Issue. Such entities may need to meet additional parameters and restrictions established via an applicable Notice of Guarantee Availability (NOGA) for a CDFI BG Program application round (see 12 CFR 1805.201(b)(2)(ii)).

**To use the CDFI Certification Spin-off provision, an entity must meet the following conditions:**

- **Independent Legal Entity:** The entity must be a separate and independent legal entity with its own Employer Identification Number (EIN).
- **Portfolio Transfer:** The entity must have received at least one portfolio of financial product transactions at no cost (not purchased) from a Spin-off-related Affiliate. This portfolio must include at least one eligible financial product transaction that was closed by the transferring entity at arm's length with the entity recognized as a financing entity of record in the associated transaction closing documents.
- **Transferring Entity Eligibility:** The transferring entity must be an Affiliate of the Spin-off at the time of the transfer and remain Affiliated when the CDFI Certification Application was submitted. The transferring entity cannot be a Certified CDFI at any point during the 12 months

of what would have been the Spin-off's most recently completed fiscal year, if it had existed at that time.

- **Eligible Financial Product Offering(s):** The entity must currently offer, as part of its eligible Financial Product activity, at least one eligible Financial Product that matches the type and purpose as a transaction included in the transferred portfolio of Financial Products.
- **Community Development Mission:** The entity, or at least one of its eligible Spin-off-related Affiliates, must have had the promotion of community development as its Primary Mission for at least six full calendar months immediately prior to submitting the CDFI Certification Application using the Spin-off provision.
- **Financial Product Transaction:** The entity must have closed at least one eligible Financial Product transaction within the 12 full calendar months immediately prior to submitting the CDFI Certification Application. This transaction must be of the same type and purpose as one of the transactions in the portfolio transferred to the entity.

An entity using the CDFI Certification Spin-off provision must have and maintain records that clearly demonstrate that all conditions of the Spin-off provision have been met. This includes, but not limited to:

- Documentation that evidences that any Financial Products portfolio it received from an entity it is claiming as an eligible Spin-off-related Affiliate was transferred to it at no cost,
- Closing documents demonstrating that the Spin-off has closed at least one eligible Financial Products transaction, which is of the same eligible Financial Products type and has the same purpose of at least one transaction included in a Financial Products portfolio transferred to the Spin-off by an eligible Spin-off-related Affiliate, and
- Closing documents demonstrating that the transferring Affiliate had itself closed the same eligible Financial Products type and has the same purpose of at least one transaction now offered by the Spin-off, prior to the relevant Financial Products portfolio transfer date.

The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, or other information related to an entity's eligibility to use the CDFI Certification Spin-off provision at any time within five years after a CDFI Certification Application using the Spin-off provision is submitted.

### **Spin-offs and the CDFI Certification Primary Mission Test**

As noted above, if an Applicant seeks to use the CDFI Certification provision for Spin-off entities, it must meet the CDFI Certification primary mission timeframe requirement by demonstrating that either it or an eligible Spin-off-related Affiliate had the promotion of community development as its primary mission.

Spin-offs must also demonstrate that each Affiliate is relevant under the general family of entities Primary Mission requirements, except if the relevant Affiliate or related entity is a tribal government.



## ***Collective Review***

### **Spin-offs and the CDFI Certification Financing Entity Test**

For the purposes of the CDFI Certification Financing Entity test, an entity using the CDFI Certification Spin-off provision should include as part of its overall eligible Financial Products and eligible Financial Services activity asset amounts all assets that:

- Appear on its own, non-consolidated balance sheet, even if they were transferred to it by an eligible Spin-off-related entity;
- Are dedicated to its eligible Financial Products or eligible Financial Services activity; or
- Were derived from a Financial Products transaction(s) closed at arm's-length and as a financing entity of record in associated transaction closing documents by an eligible Spin-off-related Affiliate or from an eligible Spin-off-related Affiliate's eligible Financial Services activity.

### **Spin-offs and the CDFI Certification Target Market Test**

If an entity is eligible for the CDFI Certification provision for Spin-offs, it must include the following Financial Products and Financial Services activity data for review in connection with the Target Market requirements:

- All eligible Financial Products transactions it closed during any part of what would have been its most recently completed fiscal year timeframe as of when the CDFI Certification Application is submitted, if it were in existence, and closed any eligible Financial Products transactions during that time;
- All eligible Financial Products transactions received as part of a spun-off Financial Products portfolio transferred to it at no cost by each entity it is claiming as an eligible Spin-off-related Affiliate. Such transactions must have been closed by the transferring entity during the Spin-off's most recently completed fiscal year when the CDFI Certification Application is submitted and that were still on the Spin-off's balance sheet as of the CDFI Certification Application submission date; and
- All depository accounts held by the Spin-off entity who is a depository institution that were still open as of the last day of its most recently completed fiscal year based on when the CDFI Certification Application is submitted (if it was in existence at that time).

#### **NOTE**

The CDFI Certification Spin-off provision can only be used when an entity applies for CDFI Certification. Once an entity receives the CDFI Certification, it must be able to demonstrate ongoing compliance with all CDFI Certification requirements without relying on any elements of the Spin-off provision, with the following exceptions:

- If a Spin-off had not been engaging in its eligible Financial Products or eligible Financial Services activity for at least one full 12-month fiscal year at the time it submits its first Annual Certification and Data Collection Report (ACR), it will be deemed compliant on that particular requirement, but only in connection with its first ACR submission; and

- The TLR data submitted in connection with the CDFI Certification Application may, if needed and if applicable, be included in the up to three fiscal year timeframe that can be used for the assessment of compliance with the CDFI Certification Target Market benchmark requirements, even if that particular data includes Financial Products transactions that were closed by an eligible Spin-off-related Affiliate (see [Spin-off-related Target Market information](#) for more details on this).

Not all entities that qualify for the CDFI Certification Spin-off provision will need to use it. Some Spin-offs may be able to meet all the CDFI Certification requirements without it.

Entities that cannot meet the CDFI Certification requirements of their own accord cannot claim the CDFI Certification status for themselves via an Affiliated Spin-off. The CDFI Certification status does not extend to a parent entity or to any other Affiliate of the Certified CDFI. The CDFI Certification only covers the entity that actually applied for and received it.

### 4.3. CDFI Certification Requirements – Collective Review

#### 4.3.1. Collective Review Requirement for Depository Institution Holding Companies (DIHC[S]), Affiliates of DIHC(S), and Subsidiaries of Insured Depository Institutions (IDI[S])



#### *Collective Review*

If an entity seeking to obtain or maintain CDFI Certification is a **DIHC, an Affiliate of a DIHC, or a Subsidiary of an IDI**—including those operated by or affiliated with a **tribal government**—it is subject to the **CDFI Certification collective review process**.

Such an entity must meet CDFI Certification requirements based on both:

1. **Its own compliance** with those requirements, and
2. **A collective review** of the following relevant Affiliates (even if those Affiliates are not seeking CDFI Certification):
  - **Any Affiliate that is a DIHC or an IDI** that controls the Applicant.
  - **If the Applicant is a DIHC**, any Affiliate it controls that directly provides Financial Products and/or Financial Services.
  - **Any Affiliate mutually controlled with the Applicant** by a DIHC or an IDI that directly provides Financial Products and/or Financial Services.

Except for **tribal governments**, each entity that is relevant to an Applicant’s CDFI Certification collective review process must be included in the Application for review—even if the entity itself is not seeking CDFI Certification or is a passive entity that conducts no business activity other than stock ownership (e.g., Employee Stock Ownership Plan [ESOP] entities).

**[CLARIFYING UPDATE 07/05/2025]**

<b>NOTE</b>	The CDFI Certification criteria to which the collective review process applies are the Primary Mission, Target Market, and Accountability tests. There is no collective review in connection with the Legal Entity, Financing Entity, Development Services, or Non-Government Entity requirements.
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**Which Applicants are subject to the CDFI Certification Collective Review Process?**

<b>If the Entity Seeking to Obtain or Maintain the CDFI Certification is:</b>	<b>Entities relevant to and included in the Applicant’s CDFI Certification collective review process are:</b>
A Depository Institution Holding Company (DIHC)	All Affiliates of the DIHC that are either bank/thrift holding companies or that engage in eligible Financial Products or eligible Financial Services activity.
An Affiliate of a DIHC(s)	The Affiliated DIHC(s) and all Affiliates of the Affiliated DIHC(s) (including entities that are not directly Affiliated with the primary entity under review) that are either bank/thrift holding companies or that engage in eligible Financial Products or eligible Financial Services activity.
The Subsidiary of an Insured Depository Institution(s) (IDI[s]); which is an entity with Federal Deposit Insurance Corporation (FDIC) insurance	The Controlling IDI(s) and all Subsidiaries of the Controlling IDI(s) that are either bank/thrift holding companies or that engage in eligible Financial Products or eligible Financial Services activity.

**DIHC(s), Affiliates of DIHC(s), and Subsidiaries of IDIs may obtain or maintain CDFI Certification only if:**

- They individually meet all the standard CDFI Certification requirements (DIHC[s] that do not engage in their own direct eligible Financial Products activity can meet the Target Market requirements based on the eligible Financial Products and, if elected and as allowed, the eligible Financial Services activity of each entity relevant to their collective review process that engages in such activity);
- Each entity relevant to their collective review process individually meets all applicable CDFI Certification Primary Mission and Accountability requirements; and
- They, along with each entity relevant to their collective review process, meet the Target Market test in the aggregate.

<b>NOTE</b>	<p>The CDFI Fund defines an Affiliate as a company or entity that Controls, is Controlled by, or operates under common Control with another company (12 CFR 1805.104). Control, Controlled, or Controlling are defined by the CDFI Fund as:</p> <ol style="list-style-type: none"> <li>1. Ownership, control, or power to vote 25% or more of the outstanding shares of any class of voting securities of any company, directly or indirectly or acting through one or more other persons;</li> </ol>
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2. Control in any manner over the election of a majority of the directors, trustees, general partners, or individuals exercising similar functions of any company; or
3. Power to exercise, directly or indirectly, a Controlling influence over the management, credit, or investment decisions or policies of any company.

### 4.3.2. Primary Mission Requirements for Entities Subject to the CDFI Certification Collective Review



#### *Collective Review*

For the purposes of the **CDFI Certification collective review process**, any entity relevant to another entity's CDFI Certification review must meet the following **Primary Mission test** requirements:

1. **Primary Mission Requirement:** The entity must have the promotion of community development as its current, governing leadership-approved primary mission.
2. **Alignment with Community Development Mission:** The entity's activities must support or align with the primary entity under review's community development mission.
3. **Responsible Financing Practices:** Any eligible Financial Products or Financial Services activity the entity engages in must comply with Primary Mission-related responsible financing practice standards.
4. **Additional DIHC-Related Requirements:**
  - Additional Mission Requirement for DIHCs
    - If the entity seeking CDFI Certification is a DIHC that does not directly engage in eligible Financial Products activity, then:
      1. Any entity relevant to that DIHC's collective review that does engage in eligible Financial Products or Financial Services activity must:
        2. Have the promotion of community development as its current governing leadership-approved primary mission.
        3. Have held this mission for at least the most recent six full calendar months.
      - In the CDFI Certification Application, this six-month period refers to the six full calendar months prior to submission. This requirement can be met through a continuous series of acceptable missions.
  - 12-Month Activity Requirement for DIHC-Related Entities
    - If a DIHC seeking CDFI Certification does not directly engage in eligible Financial Products activity, then:

1. At least one relevant entity in the DIHC’s collective review process must have engaged in eligible Financial Products or Financial Services activity for at least one full 12-month fiscal year.
2. This is based on the relevant entity’s own fiscal year timeframe, even if it differs from the primary entity under review.

<b>NOTE</b>	For each entity relevant to the collective review that only engages in eligible Financial Services activity, its eligible Financial Services will be assessed in connection with the Primary Mission test but will only be included in the collective review of Target Market if the primary entity under review elects to use the Financial Products with Financial Services option for its Target Market test.
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All related entities subject to the CDFI Certification collective review process that are separately Certified CDFIs or Community Development Entities (CDEs), as well as those whose sole activity is the participation in other federal financing programs are presumed to meet the CDFI Certification primary mission requirements.

<b>NOTE</b>	Confirmation of an entity’s line of business, as evidenced by its organizing documents, is subject to review during CDFI Certification compliance checks. Related entities subject to the CDFI Certification collective review process that engage in additional activities other than the administration of another federal financing program is not covered by this exemption.
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**CLARIFYING UPDATE 07/05/2025]**

Entities subject to the CDFI Certification collective review must also comply with the general Primary Mission standards applicable to entities with Affiliates. As a result, additional entities may become relevant to their Primary Mission review.

This occurs because any Affiliate of an entity undergoing CDFI Certification collective review—other than a tribal government—that:

- Engages in eligible Financial Products or eligible Financial Services activity, or
- Controls the entity under review but is not itself relevant to the collective review process, must still be considered in the general family of entities Primary Mission review.

**Example:** *If the primary entity under review is controlled by a non-bank entity that does not engage in direct eligible Financial Products or Financial Services activity, and is not an IDI, DIHC, or bank/thrift holding company, then this Controlling entity would not be relevant to the primary entity’s collective review process. This is because:*

- *It does not qualify as an IDI that Controls the entity under review, and*
- *It is not a DIHC or bank/thrift holding company, which would be relevant to collective review regardless of its financing activities.*

*However, this Controlling entity would still be relevant to the primary entity's general family of entities Primary Mission test, as it is a Controlling entity.*

**Example:** *If the primary entity under review is an Affiliate of a DIHC and has a non-DIHC Affiliate that engages in eligible Financial Products or eligible Financial Services activity, but does not qualify as an Affiliate of the primary entity's Affiliated DIHC(s), this non-DIHC Affiliate would not be relevant to the collective review process. However, it would be relevant to the primary entity's general family of entities Primary Mission test, since it is an Affiliate engaging in eligible Financial Products or Financial Services activity.*

### 4.3.3. Depository Institution Holding Companies that Do Not Engage in Their Own Direct Eligible Financial Products Activity – Primary Mission and Target Market Requirements



#### **Collective Review**

If an entity seeking CDFI Certification is a Depository Institution Holding Company (DIHC) that does not directly engage in eligible Financial Products activity but meets the CDFI Certification requirements for such entities, it may still qualify for CDFI Certification. This applies even if the DIHC:

- Has not engaged in closing eligible Financial Products transactions or delivering eligible Financial Services for at least one full 12-month fiscal year, as typically required under the CDFI Certification Financing Entity criterion.
- Cannot demonstrate compliance with the CDFI Certification Target Market requirements based on its own direct eligible Financial Products or, if applicable, eligible Financial Services activity.

A DIHC that does not engage in any eligible Financial Products activity remains eligible for this provision even if it does engage in eligible Financial Services activity.

#### **Requirements for DIHCs Without Direct Eligible Financial Products Activity**

If a DIHC does not engage in its own direct eligible Financial Products activity, it must meet the following conditions:

1. *Mission & Responsible Financing Practices*
  - a. Each entity relevant to the DIHC's CDFI Certification collective review process that engages in eligible Financial Products or eligible Financial Services activity must:
    - i. have a current, governing leadership-approved primary mission of promoting community development;
    - ii. meet the CDFI Certification Primary Mission-related responsible financing practice standards for its eligible Financial Products or Financial Services activity; and
    - iii. have had the promotion of community development as its primary mission for at least the most recent six full calendar months.

## 2. *Minimum Operating History Requirement*

- a. At least one entity relevant to the DIHC's CDFI Certification collective review process must have:
  - i. engaged in closing eligible Financial Products transactions or completing eligible Financial Services for at least one full 12-month fiscal year.
  - ii. This requirement is based on the relevant entity's own fiscal year timeframe, even if different from that of the DIHC.
  - iii. For CDFI Certification Applicants, this means at least one eligible Financial Products transaction must have been closed, or at least one eligible Financial Service must have been completed, on or before the first day of the most recently completed 12-month fiscal year, based on the DIHC's CDFI Certification Application submission date.

## 3. *Meeting the Target Market Requirements*

- a. The DIHC must meet the CDFI Certification Target Market requirements using:
  - i. the collective eligible Financial Products activity of all relevant entities within its CDFI Certification collective review process that engage in such activity; and
  - ii. if applicable and necessary, any eligible Financial Services activity the DIHC engages in directly, as well as the collective eligible Financial Services activity of relevant entities engaged in such activity.

## 4. *Compliance with All Other CDFI Certification Requirements*

- a. Unless the DIHC qualifies for an alternative CDFI Certification provision, the DIHC must independently meet all other applicable CDFI Certification requirements, including:
  - i. Primary Mission requirements (e.g., having promoted community development as its primary mission for at least the most recent six full calendar months and having a clear community development strategy); and
  - ii. Accountability requirements.

### 4.3.4. **Target Market Requirements for Entities Subject to the CDFI Certification Collective Review**



#### ***Collective Review***

DIHCs, Affiliates of DIHCs, and Subsidiaries of IDIs are subject to the Collective Review process for CDFI Certification. This means that during the CDFI Certification Application review process the CDFI Fund will review:

1. the individual activities of the Applicant; and
2. the activities of the Applicant's Affiliates to make sure that the Applicant and its Affiliates all meet the requirements for CDFI Certification.

An Applicant subject to Collective Review must identify its individual CDFI Certification Target Market as part of the CDFI Certification Application. In addition, the Applicant must identify a Collective Review Market for each of its Affiliates, which can be either the same Target Market components as the Applicant or a different Target Market type. The CDFI Fund will evaluate the combined Collective Review Markets of all of the Applicant's Affiliates, as well as the Applicant's proposed CDFI Certification Target Market for the CDFI Certification Collective Review process.

- The Applicant must dedicate at least 60% of its individual financing activity to its Target Market.
- At least 60% of the combined financing activity of the Applicant and its Affiliates must be dedicated to their collective Certification Market. The Affiliates do not need to meet the 60% threshold individually for their Target Market components of the collective Certification Market.

**NOTE**

If an entity relevant to the collective review process for another entity seeking to obtain or maintain the CDFI Certification does not engage in any eligible Financial Products activity (e.g., it only engages in eligible Financial Services activity or it is a DIHC that does not engage directly in any eligible financing at all, etc.), it will be disregarded when data on eligible Financial Products activity is being aggregated for the collective review of Target Market.

**NOTE**

If an entity relevant to the collective review process for another entity seeking to obtain or maintain the CDFI Certification only engages in eligible Financial Services activity, its applicable eligible Financial Service(s) data will only be included for the collective review of Target Market if the primary entity under review elects to use the Financial Products and Financial Services option for its Target Market test.

Alternatively, if an entity seeking to obtain or maintain the CDFI Certification is subject to the CDFI Certification collective review process and elects to use the Financial Products and Financial Services option for its Target Market test, each entity relevant to its collective review process that does not engage in any applicable eligible Financial Services activity will be disregarded when data on the applicable eligible Financial Services activity is being aggregated for the collective review of Target Market.

### **Transaction Level Reports and Collective Review**

The eligible Financial Products and/or, if applicable, eligible Financial Services activity for the collective review of Target Market, as well as information on any of that activity that can be counted towards meeting the CDFI Certification Target Market benchmark requirements must be presented to the CDFI Fund via separate, entity-specific Transaction Level Reports (TLRs) that include only the eligible Financial Products activity for which the relevant entity was named as the financing entity of record in the associated transaction closing documents (except as otherwise allowed for entities using the CDFI Certification Spin-off provision) and/or, if applicable, only the applicable eligible Financial Services directly delivered by that particular entity.

For more information on completing a TLR(s), see the Compiling CDFI Certification Target Market Data and [Transaction Level Report \(TLR\)](#) subsections in the Target Market section of this review guidance manual.

### **CDFI Certification Collective Review Markets**

The CDFI Certification collective review Target Market for an entity relevant to another entity's collective review process can be either

- (1) the allowed CDFI Certification Target Market for the primary entity under review; or
- (2) a Target Market component(s) that has been formally identified for the entity relevant to the collective review's own use in connection with a particular primary entity's CDFI Certification review.

The selected collective review Target Market method for a related entity in connection with a particular primary entity's collective review process must be used solely and consistently by the relevant related entity for the collective review (if applicable because the related entity engages in relevant eligible financing) and Accountability tests.

## **4.3.5. Accountability Requirements for Entities Subject to the CDFI Certification Collective Review**



### ***Collective Review***

To meet the Accountability test when subject to the CDFI Certification Collective Review process, each Applicant must demonstrate Accountability to its identified Target Market through a governing board or advisory board. In addition, each Affiliate must demonstrate Accountability to its own Collective Review Market components through its own governing board or advisory board—even if an Affiliate's Collective Review Market type(s) is the same as the Applicant's proposed CDFI Certification Target Market.

**For a DIHC, an Affiliate of a DIHC, or a Subsidiary of an IDI to be certified as a CDFI, it must demonstrate accountability both:**

- **Individually** to its own CDFI Certification Target Market, based on its own Accountability method; ***and***
- **Collectively**, where each entity relevant to its CDFI Certification collective review process must also demonstrate its accountability to either the primary entity under review's CDFI Certification Target Market or to a collective review component(s) that has been formally identified for its own use specifically in connection with the primary entity's collective review process via its own Accountability method.

### **Collective Review Controlling Entity Option for Accountability**

As an alternative, if an entity relevant to the CDFI Certification collective review process does not engage in its own Financial Products activity, it may demonstrate accountability to its selected

collective review market through an entity that Controls it. This applies even if the entity has not formally adopted the relevant board(s) used by the Controlling entity as its own.

If a Controlling entity is used to provide accountability for another entity in the collective review process, the entity must have a governing leadership-approved document that verifies the applicable Control relationship.

Additionally, the Applicant subject to the collective review may serve as a Controlling entity to provide accountability for other relevant entities that do not engage in eligible Financial Products or eligible Financial Services activity, as long as the necessary Control relationship exists.

**NOTE**

A single Controlling entity can provide accountability for as many entities relevant to a CDFI Certification collective review process as long as they meet the conditions to use that provision.

## 4.4. CDFI Certification Requirements – Documentation

Entities seeking to obtain or maintain CDFI Certification must maintain records that evidence the validity of all information provided to the CDFI Fund to demonstrate compliance with the CDFI Certification requirements. This includes any document specifically required in connection with the CDFI Certification requirements (e.g., governance document; mission documentation; if applicable, advisory board policy, etc.).

Documents specifically required in connection with the CDFI Certification requirements (e.g., governance document; mission documentation; if applicable, advisory board policy, etc.) must be maintained to continuously meet the related CDFI Certification requirement(s), as well as the CDFI Certification documentation standards (see below for the general CDFI Certification documentation standards), and be available upon request, even if not specifically collected by the CDFI Fund as part of a CDFI Certification-related submission (e.g., CDFI Certification Application, Annual Certification and Data Collection Report [ACR], etc.).

For CDFI Certification Applications, if a required document does not meet the CDFI Fund's documentation standards, it will not be considered valid, which may result in the decline of the CDFI Certification Application.

### 4.4.1. General Standards for CDFI Certification Documents

If a document is being used to substantiate the compliance of a particular entity involved in the CDFI Certification review (e.g., the entity seeking to obtain or maintain CDFI Certification, an entity relevant to another entity's CDFI Certification collective review process, an Affiliate relevant to the CDFI Certification Primary Mission review, etc.) with a CDFI Certification requirement(s) the following applies:

- The name of that entity must show clearly in the document; and
- It must match the current name of that entity either as it appears in its AMIS account, if there is one, or as it appears in the Affiliate section of the AMIS account for the entity seeking to obtain or maintain CDFI Certification.

Otherwise, documentation filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a particular jurisdiction or industry linking the entity name in the relevant document to the current entity name in AMIS must be provided.

- If the document needs to evidence that it is binding upon an entity involved in the CDFI Certification review or its approval date, there must be clear evidence, in one of the ways accepted by the CDFI Fund, of its approval by the relevant entity’s governing leadership and of its approval date (see [“Evidence that a Document is Governing Leadership-Approved”](#) for information on evidence of governing leadership approval that is accepted for CDFI Certification purposes).
- Documents must be prepared using the English language. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.

<b>NOTE</b>	In addition to the above general CDFI Certification standards for required documentation, additional standards may apply in connection with certain requirements. For example, for certain requirements, the CDFI Fund may only accept a certain type(s) of document (e.g., to document an entity’s mission, only the following document types are accepted: organizing document [e.g., articles of incorporation, charter,], governing leadership-approved governance document [e.g., bylaws, operating agreement, partnership agreement,], governing or managing board resolution, or managing member/owner resolution/directive).
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#### **4.4.2. Evidence That a Document is Governing Leadership-Approved**

For CDFI Certification purposes, the CDFI Fund currently accepts the following evidence that a document is approved by the governing leadership:

- A statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature) that was incorporated into the relevant document when it was ratified indicates the document was approved by the governing leadership and identifies its approval date.
- A statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature s) that was prepared separately from the relevant document, but clearly references it, indicates the document or the governing leadership decision it records was formally approved by the governing leadership and specifies its approval date.
- The document includes evidence that it was filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry. The evidence must be generated by the appropriate government or tribal government agency.
- Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records, and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable

signature) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.

- Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records, and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.



The CDFI Certification Application will be rejected or CDFI Certification will be terminated if it is determined that any signature presented in the Application was forged or added without the authorization of the signee.

## CDFI CERTIFICATION APPLICATION SECTIONS BY ENTITY TYPE

This Guidance document provides descriptions of the CDFI Certification Application fields in the following section, *CDFI Certification Application Sections – All Entities*. Alternatively, Applicants may reference a separate *CDFI Certification Application Sections* document that is tailored to the Applicant's entity type for ease of use.

Click on one of the following links to navigate to the document that corresponds to your entity type:

If the Applicant's Entity Type Is...	Proceed to the following Guidance document...
DIHC or Bank	<a href="#">CDFI Certification Application Guidance – DIHCs &amp; Banks</a>
Credit Union that is <i>not</i> subject to Collective Review (i.e., it is <i>neither</i> affiliated with a DIHC or Bank, <i>nor</i> is it a subsidiary of an IDI)	<a href="#">CDFI Certification Application Guidance – Credit Unions Not Subject to Collective Review</a>
Loan Fund and Venture Capital Fund	<a href="#">CDFI Certification Application Guidance – Loan Funds and Venture Capital Funds</a>
Credit Union, Loan Fund or Venture Capital Fund that <i>is</i> subject to Collective Review (i.e., it <i>is</i> either affiliated with a DIHC or Bank, or <i>is</i> a subsidiary of an IDI)	<a href="#">CDFI Certification Application Guidance – All Entities</a> (continued below in Section 5 of this document)

# CERTIFICATION APPLICATION SECTIONS

[Section Zero](#)

[Basic Information](#)

[Financial Products and Services](#)

[Legal Entity](#)

[Primary Mission](#)

[Financing Entity](#)

[Target Market](#)

[Development Services](#)

[Accountability](#)

[Non-Government Entity](#)

[Native American CDFI Designation](#)

## 5. CDFI CERTIFICATION APPLICATION SECTIONS – ALL ENTITIES

### 5.1. Section Zero - Obtaining CDFI Certification-Related Determinations on New Financial Products Type(s), New Financial Services Type(s), Amended Responsible Financing Practice(s), New Disregarded or Included Major Use(s) of Assets/Staff Time, New Targeted Population(s), and New/Amended CDFI Certification Target Market Assessment Methodology(ies)

<b>NOTE</b>	The Section Zero component of the CDFI Certification is reflected in a separate application template in AMIS than the rest of the CDFI Certification Application. Prior to submitting the Application, Applicants must indicate whether, in the Section Zero Application template, they are requesting an eligibility determination for any changes in connection with these standards for CDFI Certification purposes. If any requested similar Financial Product, similar Financial Service, financing practice, asset/staff time, Targeted Population, or CDFI Certification Target Market Assessment Methodology is deemed ineligible by the CDFI Fund for the requested purpose, the Applicant is prohibited from presenting that information in the CDFI Certification Application in the manner requested.
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The CDFI Fund establishes the Financial Products, Financial Services, disregarded or included uses of assets or staff time, Targeted Populations<sup>3</sup>, CDFI Certification Target Market Assessment Methodologies, and the responsible financing practices eligible for CDFI Certification purposes.

If, to meet the CDFI Certification requirements, an entity seeks to include a new similar financing product(s) as an eligible Financial Product(s) or a new similar Financial Services (s) as an eligible Financial Service(s); amend standards for responsible financing practices; add to the major use(s) of assets or staff time that can be disregarded or included; add an Other Targeted Population(s); or use an alternative or amended CDFI Certification Target Market Assessment Methodology(ies), it must *first* respond to a set of questions at the start of the CDFI Certification Application. For each request to be considered, the Applicant must provide detailed information or justification for the CDFI Fund to review. The Applicant will not be able to continue the Application process until the CDFI Fund renders a decision on the request. When a decision is made, the Applicant may continue with the Application process and complete the Transaction Level Report and CDFI Certification Application.

If the CDFI Fund approves a new Financial Product type, new Financial Services type, new major use(s) of assets or staff time to be disregarded or included, new Other Targeted Population, new or amended CDFI Certification Target Market Assessment Methodology, or amended standard for any responsible financing practices, it will publicly release information related to the change and update relevant list(s) or standard(s), as well as any CDFI Certification guidance materials.

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<sup>3</sup> Targeted Population means individuals or an identifiable group of individuals meeting the requirements of 12 CFR 1805.201(3)

**[CLARIFYING UPDATE 07/05/2025]**

If a determination(s) that must be approved prior to the completion and submission of a CDFI Certification Application will be requested, the CDFI Certification Application cannot be submitted until a decision on the request has been received from the CDFI Fund. The CDFI Fund will review the determination(s) request and will typically respond within 90 days after its receipt. Notification will be provided if the CDFI Fund needs more than 90 days to complete its review.

If any response in Section Zero indicates that a determination(s) will be requested, but the CDFI Certification requirements can be met without any determinations being approved by the CDFI Fund and the Applicant elects to proceed with the CDFI Certification Application without making a determination(s) request, Section Zero responses should be updated to reflect that no determination(s) request will be submitted.

If upon receipt of a determination(s) request, the decision is made to proceed with the CDFI Certification Application, any TLR for the Applicant should be reviewed to ensure it is valid (including that it still reflects most recently completed fiscal year information). The TLR(s) submission must be certified. The Target Market calculator must be run or re-run before the CDFI Certification Application can be completed and submitted. The same process must be followed if any of the circumstances listed below apply:

- Entity(ies) relevant to the Applicant's CDFI Certification collective review process that engages in eligible Financial Products activity; and/or
- Financial Products and Financial Services option for the CDFI Certification Target Market test is being used, that offers any applicable eligible Financial Services (i.e., eligible deposit accounts).

If no determinations will be requested, any TLR for the Applicant should be reviewed to ensure it is valid (including that it still reflects most recently completed fiscal year information). The TLR(s) submission must be certified. The Target Market calculator must be run or re-run before the CDFI Certification Application can be completed and submitted. The same process must be followed if any of the circumstances listed below apply:

- Entity(ies) relevant to the Applicant's CDFI Certification collective review process that engages in eligible Financial Products activity; and/or
- Financial Products and Financial Services option for the CDFI Certification Target Market test is being used, that offers any applicable eligible Financial Services (i.e., eligible deposit accounts).

**Applicant - Section Zero – (OD) Data Fields**

Questions **OD01 through OD05**: Answering these questions “Yes”/“No” will enable dependent subsections, which will allow for specific entry to propose a new item. After each question, the corresponding section number is referenced.

Field	OD01	Field Type	Picklist
Field Label/Question Text	Does the Applicant want to propose a similar Financial Product or similar Financial Services that are not currently pre-approved?		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p>Are the eligible Financial Products or eligible Financial Services offered by the Applicant something other than Financial Products or Financial Services currently allowed by the CDFI Fund?</p> <p>The CDFI Fund recognizes the following types of Financial Products: loans; Equity Investments; loan guarantees; debt with equity features; the purchase of loans originated by Certified CDFI(s); the purchase of certain loans from organizations that are not certified as CDFI(s).</p> <p>The CDFI Fund recognizes the following types of Financial Services for CDFI Certification purposes: checking accounts; savings and share accounts; check cashing; money orders; certified checks; automated teller machines; money market accounts; and safe deposit box services.</p>			
<p><i>If the Applicant answered “Yes,” complete OD01.1 through ODO1.8. (<a href="#">Section 5.1.2-OD01</a>)</i>  <b>If “No,” skip to OD02.</b></p>			
Field	OD02	Field Type	Picklist
Field Label/Question Text	Does the Applicant want to propose an amended responsible financing practice standard?		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p>Are there financing activities in which the Applicant seeks to engage that do not meet the standards for responsible financing practices set forth by the CDFI Fund?</p> <p>The Applicant will need to present one proposed amended standard at a time.</p>			
<p><i>If the Applicant answered “Yes,” complete OD02.1 through ODO2.7. (<a href="#">Section 5.1.3-OD02</a>)</i>  <b>If “No,” skip to OD03.</b></p>			

<b>Field</b>	<b>OD03</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant want to propose major assets or staff time to be disregarded or included for purposes of the Financing Entity predominance test?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Does the Applicant seek to disregard or include a major use(s) of an asset(s) or use of staff time for the purposes of the Financing Entity predominance test other than those allowed by the CDFI Fund?			
<i>If the Applicant answered “Yes,” complete OD03.1 through ODO3.8. (Section 5.1.4-OD03) If “No,” skip to OD04.</i>			
<b>Field</b>	<b>OD04</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant want to propose additional Targeted Population(s)?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response:			
<ul style="list-style-type: none"> <li>• Does the Applicant want to propose a Targeted Population other than those currently approved by the CDFI Fund?</li> <li>• The Applicant will need to present one proposed Targeted Population at a time.</li> </ul>			
<i>If the Applicant answered “Yes,” complete OD04.1 through ODO4.9. (Section 5.1.5-OD04) If “No,” skip to OD05.</i>			
<b>Field</b>	<b>OD05</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant want to propose other Target Market assessment methodologies?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant wants to propose a CDFI Certification Target Market Assessment Methodology(ies) other than the ones currently allowed by the CDFI Fund.			
While the label/question for this field indicates that it is only relevant if the new or amended Target Market Assessment Methodology is proposed in connection with a CDFI Certification Target Market, it will be completed for new or amended Assessment Methodologies proposed in connection with any			

CDFI Certification Market, including a CDFI Certification Target Market, collective review Target Market, or Native American CDFI Native Communities Market.

By Target Market Assessment Methodologies, the CDFI Fund means an Assessment Methodology(ies) used in connection with any CDFI Certification Market, including a CDFI Certification Target Market, Collective Review Target Market, or Native American CDFI Native Communities Market.

*If the Applicant answered “Yes,” complete OD05.1 through ODO5.7. ([Section 5.1.6-OD05](#))*

### 5.1.1. Obtaining Determination to Include New Financing Product Type(s) or Financing Service Type(s) as Eligible Financial Product(s) or Eligible Financial Service(s)-General

CDFI Certification Applicants that seek to include financing products or services not currently recognized by the CDFI Fund as eligible Financial Products or eligible Financial Services for the purposes of meeting the CDFI Certification requirements must provide all of the following information for the CDFI Fund’s determination in advance of completing and submitting their CDFI Certification Application:

- Name of proposed similar financing product or similar financing service
- Type of proposed similar financing product or similar financing service
- Core consumer (i.e., what individuals or entities utilize the product or service)
- Description (including rates, terms, conditions) and purpose of similar financing product or similar financing service
- Description of any protections intended to prevent the similar financing product or service from harming consumers
- Evidence that consumers are not harmed by the similar financing product or service (e.g., for a financing product, the rate of successful repayment under the original rates, terms, and conditions of that product)
- Any additional information necessary for the CDFI fund to consider the request

Any change made by the CDFI Fund to its eligible Financial Products or eligible Financial Services will be made available to all existing Certified CDFI(s), as well as future CDFI Certification Applicants.

<b>NOTE</b>	The term “similar” referenced in this section of the CDFI Certification relates to “similar financing activities (as determined by the CDFI Fund)” in the CDFI Program Revised Interim Regulations, 12 CFR Part 1805.104. If an Applicant presents a new Financial Product or Financial Service, it is technically proposing such an activity to be considered a new “similar financing [activity]” as determined by the CDFI Fund per 12 CFR 1805.104. Therefore, Applicant might consider “similar,” as referenced throughout the Section Zero component of the CDFI Certification Application, as the new financing product type or financing service type that it is proposing to be as an Eligible Financial Products or Eligible Financial Service.
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This subsection will appear **only if OD01 was answered “Yes”**. If the Applicant requests determination of multiple eligible Financial Products or eligible Financial Services, repeat Questions OD01.1 through OD01.8.

**Applicant - Section Zero – (OD01) Data Fields**

<p><i>If the Applicant requests determination of similar Financial Products or similar Financial Services, complete questions OD01.1 through OD01.8.</i></p>			
<b>Field</b>	<b>OD01.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Select the proposed activity.		
<b>Response</b>	Select one: <ul style="list-style-type: none"> <li>Similar Financial Product</li> <li>Similar Financial Service</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response to identify the activity to be presented. The Applicant will need to present one similar Financial Products or similar Financial Service at a time.			
<b>Field</b>	<b>OD01.2</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Provide the name of the proposed similar Financial Product/similar Financial Service.		
<b>Response</b>	Enter name.		
<b>Response Instruction(s)</b>			
Enter the name of the similar Financial Products or similar Financial Service as presented to the consumer.			
<b>Field</b>	<b>OD01.3</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Provide a description of the proposed similar Financial Product/similar Financial Service and its purpose.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
The narrative should include, but is not limited to, purpose of similar Financial Products or similar Financial Service, rates, terms, conditions, and fees.			
<b>Field</b>	<b>OD01.4</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Identify the target borrower, investee, or service recipient.		

<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
Describe who is the intended consumer for the similar Financial Products or Financial Service.			
<b>Field</b>	<b>OD01.5</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Describe any protections that ensure the proposed similar Financial Product does not harm consumers.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
Fully describe any guardrails intended to prevent the similar Financial Products or similar Financial Service from harming the consumer.			
<b>Field</b>	<b>OD01.6</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Provide evidence that consumers are not harmed by the proposed similar Financial Product.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
Evidence should include, but is not limited to, the rate of successful repayments under the original rates, terms, and conditions of the product.			
<b>Field</b>	<b>OD01.7</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Provide any additional information necessary for the CDFI Fund to consider the request.		
<b>Response</b>	Narrative or N/A		
<b>Response Instruction(s)</b>			
In addition to the responses provided above, provide any additional information deemed necessary for the determination of the proposed similar Financial Products or similar Financial Service.			

Field	OD01.8	Field Type	Attachment
Field Label/Question Text	Attach relevant support document(s).		
Response	Attachment(s)		
Response Instruction(s)			
Attach any relevant supporting documents deemed necessary for the determination of the proposed similar Financial Products or similar Financial Service.			
<i>If the Applicant requests determination of multiple similar Financial Products or similar Financial Services, repeat questions <b>OD01.1 through OD01.8</b>.</i>			

### 5.1.2. OD02 – Propose Amended Responsible Financing Practice Standards

This subsection will appear **only if OD02 was answered “Yes”**. If the Applicant requests amendment of multiple financing practice standards, repeat Questions OD02.1 through OD02.7

#### **Obtaining Determination to Amend a Responsible Financing Practices Standard(s)**

The current [responsible financing practices standards](#) established in connection with the CDFI Certification Primary Mission test allow for certain circumstances under which eligible Financial Products or eligible Financial Services activity involving an otherwise disqualifying financing practice(s) might still be acknowledged as serving an acceptable community development purpose. Therefore, it would not prevent an entity engaging in such activity, or that has an Affiliate or another entity relevant to its CDFI Certification review that engages in such activity, from being able to obtain or maintain the CDFI Certification.

For example, entities that offer consumer loans that exceed an annual percentage rate (APR) of 36% may still be determined eligible for CDFI Certification if certain conditions are met for that product, such as that product having, among other conditions, a default rate no greater than 5%, a limit on fees to refinance a relevant loan, and substantially equal loan payments that amortize to a zero balance. Similarly, certain otherwise disqualifying residential real estate mortgage loan characteristics are allowable for the purposes of CDFI Certification if additional criteria are met.

Entities that engage in or that have Affiliates or other entities relevant to their CDFI Certification review that engage in eligible Financial Products or eligible Financial Services activity that do not meet a current responsible financing practices standard(s) in connection with the CDFI Certification Primary Mission test, nor any relevant existing additional criteria that would enable such activity to still be acknowledged as serving an acceptable community development purpose, may seek an amendment to the relevant responsible financing practices standard(s).

CDFI Certification Applicants that seek to amend a CDFI Certification Primary Mission-related responsible financing practices standard(s) must provide the following information for the CDFI Fund’s determination in advance of the submission of their CDFI Certification Application:

- Description of the eligible Financial Products or eligible Financial Services activity that does not meet a current CDFI Certification responsible financing practice standard(s), and any relevant existing additional criteria that would enable such activity to still be acknowledged as serving an acceptable community development purpose in connection with the CDFI Certification;
- Current responsible financing practices standard(s) that the eligible Financial Products or eligible Financial Services activity does not meet;
- Explanation of why and how the eligible Financial Products or eligible Financial Services activity serves a community development purpose even though it does not meet the applicable current responsible financing practices standard(s);
- Explanation of why and how the applicable current responsible financing practices standard(s) should be amended that includes a description of any protections intended to prevent the eligible Financial Products or eligible Financial Services activity from harming consumers; or any conditions under which the eligible Financial Products or eligible Financial Services activity should be considered an acceptable community development activity, even though it does not meet the applicable current responsible financing practices standard(s) (e.g., limits on rates charged, purpose, borrower characteristics, etc.);
- Evidence that consumers are not harmed by the eligible Financial Products or eligible Financial Services activity, even though it does not meet the applicable current responsible financing practices standard(s) (e.g., if discussing a Financial Products characteristic, the rate of successful repayment under the original rates, terms, and conditions of the Financial Products); and
- Any additional relevant information.

Any amendment(s) made by the CDFI Fund to a responsible financing practice standard will be made available to all existing Certified CDFI(s), as well as future CDFI Certification Applicants.

**Applicant - Section Zero – (OD02) Data Fields**

<i>If the Applicant requests determination to amend a responsible financing practices standard(s), complete questions <b>OD02.1 through OD02.8.</b></i>			
<b>Field</b>	<b>OD02.1</b>	<b>Field Type</b>	<b>Narrative</b>
<b>Field Label/Question Text</b>	Describe the financing activity.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
Fully describe the financing activity that does not meet a current CDFI Certification responsible financing practice standard(s).			

<b>Field</b>	<b>OD02.2</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Identify the current standard the financing activity does not meet.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
State the current responsible financing practices standard(s) set by the CDFI Fund that the financing activity does not meet.			
<b>Field</b>	<b>OD02.3</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Describe how the financing activity serves a community development purpose.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
Fully describe how the Applicant believes the financing activity serves a community development purpose.			
<b>Field</b>	<b>OD02.4</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Describe any protections that ensure the financing activity does not harm consumers or conditions under which the financing activity should be considered an acceptable community development activity.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
<p>Explain why and how the applicable current responsible financing practice standard should be amended.</p> <p>Fully describe any guardrails provided that intend to prevent the financing activity from harming the consumer or how the financing activity should be deemed an acceptable community development activity.</p>			
<b>Field</b>	<b>OD02.5</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Provide evidence that consumers are not harmed.		
<b>Response</b>	Narrative		

Response Instruction(s)			
If discussing a financial product characteristic, evidence should include, but be not limited to, the rate of successful repayments under the original rates, terms, and conditions of the product. Provide evidence that consumers are not harmed by the eligible Financial Products or Financial Service activity, even though it does not meet the applicable current responsible financing practice standard.			
Field	OD02.6	Field Type	Narrative
Field Label/Question Text	Provide any additional information necessary for the CDFI Fund to consider the request.		
Response	Narrative		
Response Instruction(s)			
In addition to the responses provided above, provide any additional information deemed necessary for the determination of any amendments to the responsible financing practice proposed.			
Field	OD02.7	Field Type	Attachment
Field Label/Question Text	Attach relevant support document(s).		
Response	Attachment(s)		
Response Instruction(s)			
Attach any relevant support documents deemed necessary for the determination of the responsible financing practice proposed.			
<i>If the Applicant requests amendment of multiple financing practice standards, repeat questions OD02.1 through OD02.7.</i>			

### 5.1.3. OD03 – Propose Financing Entity Predominance Test

This subsection will appear **only if OD03 was answered “Yes.”** If the Applicant requests determination of multiple major assets and/or staff time to be disregarded or included, repeat Questions OD03.1 through OD03.8.

#### **Obtaining Determination to Add Major Use(s) of Assets or Staff Time Eligible to be Disregarded or Included for the CDFI Certification Financing Entity Predominance Test**

Entities that seek to disregard as irrelevant or include as acceptable any major use(s) of an asset(s) or staff time not currently eligible to be disregarded or included for the purposes of determining whether an entity is predominantly engaged in eligible Financial Products or eligible Financial Services activity in connection with the CDFI Certification Financing Entity requirements must obtain a determination from

the CDFI Fund allowing the change before the related assets or staff time to be disregarded or included for the purposes of the Financing Entity predominance test.

CDFI Certification Applicants, that seek to add any major use(s) of an asset(s) or staff time to those eligible to be disregarded or included for the purposes of the CDFI Certification Financing Entity predominance test, must provide the following information for the CDFI Fund's determination in advance of the submission of their CDFI Certification Application:

- A description of what major purpose(s)/activity(ies) the asset(s) to be disregarded or included is dedicated to/derived from or what major activity(ies) the staff time to be disregarded or included supports;
- For an asset-related request, the name of each relevant balance sheet line item that includes assets dedicated to/derived from the relevant purpose/activity and the dollar amount for the portion of each balance sheet line item to be disregarded or included;
- For a staff time-related request, the average FTE staff time dedicated to the relevant activity to be disregarded or included;
- An explanation of how the amount of the asset(s) or staff time to be disregarded or included was determined;
- If seeking to disregard any major use of an asset(s) or staff time, an explanation of why that particular use of the asset(s) or staff time would incorrectly contribute to the appearance that the Applicant is not predominantly engaged in eligible Financial Products or eligible Financial Services activity;
- If seeking to include any major use of an asset(s) or staff time, an explanation of why the purpose/activity the asset(s) is dedicated to/derived from or the activity the staff time supports is essential to the eligible Financial Products or eligible Financial Services activity must be provided; and



**[CLARIFYING UPDATE 07/05/2025]**

A copy of the balance sheet for the last day of the entity's most recently completed fiscal year and of the entity's current fiscal year-to-date balance sheet (the current fiscal year to date balance sheet must have an as of date from within the current fiscal year to date timeframe that is no more than 45 days prior to the date when the request is submitted, which is determined based on Eastern time [i.e., the Eastern time submission time stamp on the request will be used to determine its submission date]) that show the entity's own, non-consolidated financial information separately and distinctly from any other entity.

Any change made by the CDFI Fund to the use(s) of assets or staff time eligible to be disregarded or included for the CDFI Certification Financing Entity Predominance Test practices will be made available to all existing Certified CDFIs, as well as future CDFI Certification Applicants.

**Applicant - Section Zero – (OD03) Data Fields**

<p><i>If the Applicant requests determination of major uses(s) of an asset(s) or staff time to be eligible to be disregarded or included, complete questions <b>OD03.1 through OD03.8</b>.</i></p>			
<b>Field</b>	<b>OD03.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant seek to disregard or include major assets or staff time?		
<b>Response</b>	Select one: <ul style="list-style-type: none"> <li>Include major assets or staff time</li> <li>Disregard major assets or staff time</li> </ul>		
<b>Response Instruction(s)</b>			
The Applicant will need to specify whether it is seeking to include or disregard a major asset or use of staff time to include or major asset or use of staff time to disregard one at a time.			
<b>Field</b>	<b>OD03.2</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Provide a description of the major assets or staff time to be disregarded or included.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
The narrative should include, but not be limited to, the line item(s) of, as applicable, the major asset and description of the major asset or use of staff time.			
<b>Field</b>	<b>OD03.3</b>	<b>Field Type</b>	Currency
<b>Field Label/Question Text</b>	Enter the dollar amount for the portion of the balance sheet line item(s) to be disregarded or included, and the name of the balance sheet line item(s).		
<b>Response</b>	Enter dollar amount and name of balance sheet line item		
<b>Response Instruction(s)</b>			
Enter the name of the balance sheet line item and associated dollar amount for the asset requested to be disregarded or included.			
<b>Field</b>	<b>OD03.4</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Enter the average FTE staff time to be disregarded.		

<b>Response</b>	Enter average FTE staff time.		
<b>Response Instruction(s)</b>			
Enter the average FTE staff time for the activity that is requested to be disregarded.			
<b>Field</b>	<b>OD03.5</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	How did the Applicant determine the amount of the major asset(s) or staff time to be disregarded or included?		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
Describe how the Applicant determined the amount of the major asset(s) or FTE staff time to be disregarded or included.			
<b>Field</b>	<b>OD03.6</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	If seeking to disregard any major asset(s) or staff time, provide an explanation for why the major asset(s) or staff time incorrectly appears to indicate the Applicant is not predominately a financing entity.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
Provide an explanation for why the major asset(s) or staff time to be disregarded incorrectly appears to indicate the Applicant is not predominately a financing entity.			
<b>Field</b>	<b>OD03.7</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	If seeking to include any major asset(s) or staff time, provide an explanation for why the major asset(s) or staff time dedicated to this activity is essential for the Applicant to conduct its Financial Product or Financial Services activity.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
Provide an explanation for why the major asset(s) or FTE staff time to be included is essential for the Applicant to conduct its eligible Financial Products or eligible Financial Services activity.			

Field	OD03.8	Field Type	Attachment
Field Label/Question Text	Attach Applicant’s most recently completed fiscal year balance sheet, and income statement, and current fiscal year-to-date balance sheet.		
Response	Attachment(s)		
Response Instruction(s)			
Attach the Applicant’s recently completed fiscal year balance sheet, income statement, and current fiscal year-to-date balance sheet.			
If the Applicant requests determination of multiple major assets or staff time to be disregarded or included, repeat questions <b>OD03.1 through OD03.8</b> .			

### 5.1.4. OD04 – Propose Additional Targeted Population(s)

This subsection will appear **only if OD04 was answered “Yes.”** If the Applicant requests determination of multiple Targeted Populations, repeat Questions OD04.1 through OD04.9. For each proposed Targeted Population, the Applicant also must submit a proposed Target Market Assessment Methodology (OD05.1 through OD05.7) for that Targeted Population.

#### **Obtaining Determination for New Targeted Population(s)**

Targeted Populations that are not already recognized by the CDFI Fund must be approved by the CDFI Fund before they can be included as part of an entity’s CDFI Certification Target Market.

CDFI Certification Applicants that seek recognition of a new Targeted Population for CDFI Certification Target Market purposes must provide all of the following information for the CDFI Fund’s determination in advance of the submission of their CDFI Certification Application:


- A name for and description of the proposed new Targeted Population, including the specific characteristic(s) used to identify members of that population;
- The geographic area to be associated with the proposed new Targeted Population (e.g., all U.S. states, all U.S. territories, and the District of Columbia; a specific state or U.S. territory; or a specific set of contiguous states or U.S. territory(ies); a specific county or a specific set of contiguous counties; a specific census tract or a specific set of contiguous census tracts). Unless the proposed geography is all U.S. states, all U.S. territories, and the District of Columbia, include a map generated in the CDFI Information Mapping System (CIMS) depicting the associated geography;
- A narrative demonstrating that members of the proposed new Targeted Population experience significant unmet capital, credit, or Financial Services needs specifically within the chosen geographic area;
- Specific evidence showing that members of the proposed new Targeted Population experience disparate treatment with regard to their access to eligible Financial Products and Financial Services specifically within the chosen geographic area and, controlling for poverty and income effects, expressly because they have or are perceived to have the characteristic(s) used to identify/define

the relevant population (i.e., specifically because of their actual or perceived status as members of the proposed Targeted Population; the evidence should demonstrate that the characteristic(s) that defines the proposed new Targeted Population is the determinant cause of the disparate treatment its members experience with regard to their access to eligible Financial Products and Financial Services within the chosen geographic area);

- An explanation of whether the Applicant serves the proposed new Targeted Population directly through its own eligible Financial Products or eligible Financial Services activity or, for its eligible Financial Products activity only, indirectly or through its Financial Products consumers; and
- A proposed CDFI Certification Target Market Assessment Methodology(ies) for determining whether eligible Financial Products or eligible Financial Services activity has been directed to the new Targeted Population; and if applicable, addresses how the Applicant will ensure that any consumers of its Financial Products activity via, which it may indirectly serve members of the proposed new Targeted Population, are properly verifying Targeted Population status.

Any change made by the CDFI Fund to the recognized CDFI Certification Targeted Populations will be made available to all existing Certified CDFI(s), as well as future CDFI Certification Applicants.

**Applicant - Section Zero – (OD04) Data Fields**

	For each proposed Targeted Population, the Applicant also must propose the related CDFI Certification Target Market Assessment Methodology for that Targeted Population.
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*If the Applicant requests determination of Targeted Populations, complete questions **OD04.1 through OD04.9**. For each proposed Targeted Population, the Applicant also must submit a proposed CDFI Certification Target Market Assessment Methodology for that Targeted Population.*

<b>Field</b>	<b>OD04.1</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Provide the name of/for the Targeted Population.		
<b>Response</b>	Enter name.		
<b>Response Instruction(s)</b>			
Identify the name of/for the proposed Targeted Population.			
<b>Field</b>	<b>OD04.2</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Provide a description of the Targeted Population.		
<b>Response</b>	Narrative		

Response Instruction(s)			
Fully describe the proposed Targeted Population.			
Field	OD04.3	Field Type	Text
Field Label/Question Text	Identify the geographic location of the Targeted Population intended to be served.		
Response	Enter geography.		
Response Instruction(s)			
Describe the geography in which the proposed Targeted Population will be served. The geography might be a local area (e.g., a county[ies], state[s], region[s]) or include all U.S. states, all U.S. territories, and the District of Columbia (i.e., national).			
Field	OD04.4	Field Type	Text
Field Label/Question Text	Unless “national,” enter map name of geography created in CIMS.		
Response	Enter Map Name.		
Response Instruction(s)			
If the Applicant is presenting a geography, other than all U.S. states, all U.S. territories, and the District of Columbia (i.e., national), use CIMS to create a map of the proposed geography. Enter the map name.			
Field	OD04.5	Field Type	Narrative
Field Label/Question Text	Provide a narrative that demonstrates that the specific Targeted Population has significant unmet capital for Financial Services needs.		
Response	Narrative		
Response Instruction(s)			
Provide information that evidences the significant unmet capital or Financial Services needs of the Targeted Population. The supporting evidence must pertain specifically to the proposed Targeted Population in the designated geographic area. Also include information that evidences the population cannot be served through an eligible Investment Area.			

<p><b>The following are examples of potentially acceptable data sources to ODO4.5:</b></p> <ul style="list-style-type: none"> <li>• Mortgage (Home Mortgage Disclosure Act – HMDA) and small business lending data indicating that traditional financial institutions do not serve the group or decline individuals from the group at a higher rate than other groups</li> <li>• Studies indicating inadequate access to capital or high levels of loan or account denials by traditional financial institutions among members of the OTP in the geographic area</li> <li>• Information showing an inadequate number of bank branches or other traditional financial institutions within the geographic area</li> <li>• Data regarding the proliferation of high-cost/predatory lenders within the geographic area</li> <li>• Data that demonstrate that a larger and significant portion of the OTP is “unbanked” when compared with other populations</li> </ul>			
<b>Field</b>	<b>OD04.6</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Identify whether the Applicant serves the members of the Targeted Population directly or indirectly.		
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• Directly</li> <li>• Indirectly</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response that identifies whether the Applicant serves the members of the Targeted Population directly or indirectly (e.g., through borrowers or investees that serve such members).			
<b>Field</b>	<b>OD04.7</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Provide a description of the specific evidence showing the proposed Targeted Population has disparities, controlling for poverty and income effects, in their access to Financial Products and Services for the geographic population service area.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
Provide specific evidence showing the proposed Targeted Population has disparities, controlling for poverty and income effects, in its access to eligible Financial Products and Financial Services within the identified geographic area.			

<b>Field</b>	<b>OD04.8</b>	<b>Field Type</b>	Attachment
<b>Field Label/Question Text</b>	Attach the specific evidence used to demonstrate support of the need.		
<b>Response</b>	Attachment(s)		
<b>Response Instruction(s)</b>			
Attach the specific evidence used to demonstrate support of the need.			
<b>Field</b>	<b>OD04.9</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Provide any additional information necessary for the CDFI Fund to consider the request.		
<b>Response</b>	Narrative or N/A		
<b>Response Instruction(s)</b>			
In addition to the responses provided above, provide any additional information deemed necessary for the determination of the Targeted Population proposed or enter N/A.			
<i>If the Applicant requests determination of multiple Targeted Populations, repeat questions <b>OD04.1 through OD04.9</b>.</i>			

### 5.1.5. OD05 – Propose Other Target Market Assessment Methodologies

This subsection will appear **only if OD05 was answered “Yes”**. If the Applicant requests determination of multiple Target Market assessment methodologies, repeat Questions OD05.1 through OD05.7.

#### **Obtaining Determination for New or Amended CDFI Certification Target Market Assessment Methodology(ies)**

An acceptable CDFI Certification Target Market Assessment Methodology or combination of such methodologies must be used to verify whether eligible Financial Products activity or eligible depository account activity can be counted towards meeting the Target Market or, if applicable, Native American CDFI Native Communities Market activity benchmarks, and to assess whether board members presented as accountable in certain ways or credit union members are part of a particular market type(s).

Only the CDFI Certification market assessment methodologies approved by the CDFI Fund may be used when compiling CDFI Certification-related Target Market data. A list of pre-approved CDFI Certification market assessment methodologies can be found on the CDFI Fund website.

Entities may request approval of a CDFI Certification Target Market Assessment Methodology(ies) not already allowed by the CDFI Fund or amendment of an existing methodology(ies).

CDFI Certification Applicants that seek to use a CDFI Certification Target Market Assessment Methodology other than one that appears on or in a way other than as described in the list of approved

CDFI Certification Target Market Assessment Methodologies (i.e., that seek to use a new or amended CDFI Certification Target Market Assessment Methodology), including the use of programmatic proxy assessments, must provide the following information for the CDFI Fund to consider before they submit their CDFI Certification Application:

- The applicable Target Market type (i.e., Investment Area, Low-Income Targeted Population, or Other Targeted Population);
- A description of the proposed CDFI Certification Target Market Assessment Methodology (e.g., description of the proposed methodology or model design, including the step-by-step process used to collect the needed data, review any documentation, or run the assessment model and process its results);
- All supporting or supplemental documentation;
- A description of how the proposed Target Market Assessment Methodology provides sufficient confidence that a Financial Products consumer, board member or credit union member can be assigned to a specific CDFI Certification market component;
- If proposing a programmatic proxy, the program's detailed eligibility criteria or the step-by-step process used to compare programmatic data to CDFI Fund parameters for the relevant CDFI Certification market type (e.g., income sources, income thresholds);
- The process for recordkeeping; and
- The process for updating any methodology dependent on underlying data changes.

Applicants may attach documents that provide a more complete description of a proposed Target Market Assessment Methodology than what is allowed by the online request form due to character limits in the response fields.

All CDFI Certification market assessment methodologies must be used exactly as prescribed, unless and until modification of the process is authorized by the CDFI Fund. Failure to use an approved CDFI Certification Target Market Assessment Methodology exactly as prescribed by the CDFI Fund (or maintain related required documentation) may result in the termination of an entity's CDFI Certification.

Any change made by the CDFI Fund to the approved CDFI Certification Target Market Assessment Methodologies will be made available to all existing Certified CDFI(s), as well as to future CDFI Certification Applicants.

### **Obtaining Determination for Proposed Other Target Market Assessment Methodologies**



For each proposed Targeted Population, the Applicant also must propose the related CDFI Certification Target Market Assessment Methodology for that Targeted Population.

**Applicant - Section Zero – (OD05) Data Fields**

<b>Field</b>	<b>OD05.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Identify the applicable Target Market type.		
<b>Response</b>	Select one: <ul style="list-style-type: none"> <li>• Investment Area</li> <li>• Low-Income Targeted Population</li> <li>• Other Targeted Population</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response to identify the market type associated with the CDFI Certification Target Market Assessment Methodology being proposed. While the label/question for this field indicates that it is only relevant if the new or amended Target Market Assessment Methodology is proposed in connection with a CDFI Certification Target Market, it will be completed for new or amended Target Market Assessment Methodologies proposed in connection with any CDFI Certification market, including a CDFI Certification Target Market, collective review Target Market, or Native American CDFI Native Communities Market. By Target Market type, the CDFI Fund means a CDFI Certification Target Market, collective review Target Market, or Native American CDFI Native Communities Market type.			
<b>Field</b>	<b>OD05.2</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Describe the assessment methodology.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
The narrative should include, but not be limited to, the step-by-step process used to collect the data, review any documents, or run the model and process its results.			
<b>Field</b>	<b>OD05.3</b>	<b>Field Type</b>	Attachment
<b>Field Label/Question Text</b>	Attach any supporting or supplemental documentation necessary to provide a full description of the proposed assessment methodology.		
<b>Response</b>	Attachment		

Response Instruction(s)			
In addition to the responses provided above, provide any supporting or supplemental documentation deemed necessary to fully describe the proposed Target Market Assessment Methodology.			
Field	OD05.4	Field Type	Narrative
Field Label/Question Text	Describe how the proposed assessment methodology provides sufficient confidence that a transaction can be assigned to a specific Target Market.		
Response	Narrative		
Response Instruction(s)			
Fully describe how the proposed Target Market Assessment Methodology provides sufficient confidence that a Financial Products consumer, board member, or credit union member can be assigned to a specific market component. While the label/question for this field indicates that it is only relevant if the new or amended Target Market Assessment Methodology is proposed in connection with a CDFI Certification Target Market, it will be completed for new or amended Target Market Assessment Methodologies proposed in connection with any CDFI Certification market, including a CDFI Certification Target Market, collective review Target Market, or Native American CDFI Native Communities Market. When “Target Market type” is used, the CDFI Fund means a CDFI Certification Target Market, collective review Target Market, or Native American CDFI Native Communities market type.			
Field	OD05.5	Field Type	Narrative
Field Label/Question Text	If proposing a programmatic proxy, provide the program’s detailed eligibility criteria or the step-by-step process used to compare programmatic data to CDFI Fund definitions.		
Response	Narrative		
Response Instruction(s)			
Fully describe the programmatic proxy being proposed, including but not limited to income sources or income thresholds. If the Applicant is not proposing a programmatic proxy, enter NA.			

<b>Field</b>	<b>OD05.6</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Describe the process for recordkeeping as well as updating any methodology dependent on underlying data changes.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
Fully describe the recordkeeping process and how the Applicant will update any methodology that is dependent on changes to underlying data.			
<b>Field</b>	<b>OD05.7</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Provide any additional information necessary for the CDFI Fund to consider the request.		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
In addition to the responses provided above, provide any additional information deemed necessary for determination of the methodology being proposed.			
<i>If the Applicant requests determination of multiple CDFI Certification market assessment methodologies, repeat questions <b>OD05.1 through OD05.7</b>.</i>			

## 5.2. Basic Information

### 5.2.1. Basic Information Requirements

The Basic Information section of the CDFI Certification Application collects general information about the CDFI Certification Applicant and, if applicable, each Affiliate or other entity that must be reviewed along with the Applicant as part of the assessment of its compliance with the CDFI Certification requirements.

Certain information in the Basic Information section will be auto populated based on data from the Applicant's AMIS account or from the AMIS account of an Affiliate or other entity relevant to the review.

To ensure that accurate information is auto populated into the CDFI Certification Application form, data in the Applicant's AMIS account and, if applicable, in the AMIS account for each Affiliate or other entity relevant to the Applicant's CDFI Certification review must be up to date.

#### NOTE

CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.

The name of the Applicant and, if applicable, of each Affiliate or other entity relevant to the Applicant's CDFI Certification review identified in the CDFI Certification Application must match the entity name as it is registered in the federal government's System for Award Management (SAM) at [SAM.gov](https://sam.gov), or the Application will be rejected. As discussed in more detail under Legal Entity, entities seeking to obtain or maintain CDFI Certification and, if applicable, each Affiliate or other entity relevant to their CDFI Certification review must have a UEI generated by SAM and must maintain an active and valid SAM registration at [SAM.gov](https://sam.gov).




Information collected in the "Basic Information – Board and Executive Staff Demographic information – Applicant" section is not assessed as part of the CDFI Certification review and has no bearing on the CDFI Certification determination.

### **Completing the CDFI Certification Application Basic Information Section**

To complete the Basic Information section of the CDFI Certification Application, an Applicant will:

- Create an AMIS account for itself or review and, if needed, update data fields on the Organization page in an existing account.
- If applicable, create a record for each Affiliate or other entity relevant to the Applicant's CDFI Certification review in the AMIS Affiliate section of the Applicant's AMIS account.
- If applicable, create an AMIS account for each Affiliate or other entity relevant to its CDFI Certification review or review and, if needed, update existing accounts.
- Review and, if needed, provide or correct any information intended to be auto populated into the CDFI Certification Application Basic Information section fields.

- Complete the non-auto populated Basic Information section fields.
- Attach copies of all required documentation.



If information in the CDFI Certification Application that is supposed to be auto populated from the Applicant’s or another entity’s AMIS account is missing or inaccurate, that information must be provided or updated in the relevant AMIS account and correctly auto populated in the CDFI Certification Application form before the Application is submitted. To update AMIS account data that can be modified directly by the account holder, follow the instructions in the [AMIS Training Materials](#). For assistance with AMIS account data that can only be updated by the CDFI Fund, an AMIS Service Request should be submitted.

<b>NOTE</b>	<p>If, in accordance with an exception made by an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry, an entity does not have a governance document (bylaws, operating agreement, partnership agreement, or similar), and a document that explains such situation that is signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) including the governing leader/official Corporate Secretary’s signature date, must be provided, along with documentation from the relevant government or tribal government agency that verifies the exception.</p>
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### 5.2.2. Applicant Basic Information

#### Applicant – Basic Information – (BI) Data Fields

Field	BI01	Field Type	Auto-populated
Field Label/Question Text	Applicant – Entity Name		
Response	[Auto populated from the Applicant’s AMIS account]		
<b>Response Instruction(s)</b>			
<p>The auto populated response reflects the entity name entered on the Organization page (Details tab) of the Applicant’s AMIS account.</p> <p>The auto populated response must be the legal name of the Applicant entity as it appears in all relevant legal documents, such as the Applicant’s organizing documentation (e.g., articles of incorporation, charter or similar) that was used for its SAM registration at SAM.gov or the Application</p>			

<p>will be rejected. DBA/trade/assumed/fictitious names are not allowed. Please make sure spelling, punctuation, and capitalization are all correct.</p> <p>If the entity name in this field is not the Applicant’s exact legal name as it appears in its SAM registration, please contact the CDFI Fund via an AMIS Service Request to have it corrected before the CDFI Certification Application is submitted.</p>			
<b>Field</b>	<b>BI02</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Applicant – Financial Institution Type		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		
<b>Response Instruction(s)</b>			
<p>The auto populated response reflects the selection made on the Organization page (Details tab) of the Applicant’s AMIS account.</p> <p>If the data in this field is not accurate, please contact the CDFI Fund via an AMIS Service Request to have it corrected before the CDFI Certification Application is submitted.</p>			
<b>Field</b>	<b>BI03</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Applicant – Depository Institution Holding Company		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select <b>“Yes”</b> if the Applicant is a Depository Institution Holding Company (DIHC) as defined in the Definitions section of the CDFI Program interim regulations (section 104; 12 CFR 1805.104).</p> <p>DIHC is defined in the Definitions section of the CDFI Program interim regulations (section 104; 12 CFR 1805.104) as a bank holding company or a savings and loan holding company as defined in section 3 of the Federal Deposit Insurance Act (12 U.S.C. 1813(w)(1)).</p>			
<b>Field</b>	<b>BI04</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Applicant – Minority Depository Institution		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		
<b>Response Instruction(s)</b>			
<p>Select <b>“Yes”</b> only if the Applicant is a depository institution that has been designated as a Minority Depository Institution (MDI) by the Federal Deposit Insurance Corporation (FDIC) or the National Credit Union Administration (NCUA).</p>			

<p>If the Applicant is not a depository institution, it must answer “No” to this question.                  To verify MDI status, see the list of FDIC-designated MDIs <a href="#">here</a> and NCUA-designated MDIs <a href="#">here</a>.  <b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – depository institution</li> </ul>			
<b>Field</b>	<b>BI05</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Applicant – EIN		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		
<b>Response Instruction(s)</b>			
<p>The CDFI Certification can only be conferred on an entity that is <a href="#">the primary holder of a federal Employer Identification Number (EIN)</a>.                  The auto populated response reflects information entered on the Organization page (Details tab) of the Applicant’s AMIS account.                  If the data in this field is not accurate, please contact the CDFI Fund via an AMIS Service Request to have it corrected before the CDFI Certification Application is submitted.</p>			
<b>Field</b>	<b>BI06</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Applicant – Unique Entity ID		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		
<b>Response Instruction(s)</b>			
<p>The auto populated response reflects information entered on the Organization page (Details tab) of the Applicant’s AMIS account.                  The auto populated response must be the Unique Entity ID generated by SAM at SAM.gov.                  If the data in this field is not accurate, please contact the CDFI Fund via an AMIS Service Request to have it corrected before the CDFI Certification Application is submitted.</p>			
<b>Field</b>	<b>BI07</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Applicant – Date of Incorporation/Organization/Establishment		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		

Response Instruction(s)			
<p>The auto populated response reflects information entered on the Organization page (Details tab) of the Applicant’s AMIS account.</p> <p>An entity’s date of incorporation/organization/establishment is the date it was first officially registered with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.</p> <p>The date of incorporation/organization/establishment showing in this field must match the date of registration with a relevant government or tribal government agency evidenced in the Applicant’s official incorporation/organization/establishment documentation (will typically be the date the incorporation/organization/establishment paperwork was filed with or approved by the relevant government or tribal government agency).</p> <p>If the data in this field is not accurate, please contact the CDFI Fund via an AMIS Service Request to have it corrected before the CDFI Certification Application is submitted.</p>			
Field	BI08	Field Type	Auto populated
Field Label/Question Text	Applicant – Fiscal Year End Month		
Response	[Auto populated from the Applicant’s AMIS account]		
Response Instruction(s)			
<p>The auto populated response reflects information entered on the Organization page (Details tab) of the Applicant’s AMIS account.</p> <p>If the data in this field is not accurate, please contact the CDFI Fund via an AMIS Service Request to have it corrected before the CDFI Certification Application is submitted.</p>			
Field	BI09	Field Type	Auto populated
Field Label/Question Text	Applicant – Fiscal Year End Day		
Response	[Auto populated from the Applicant’s AMIS account]		
Response Instruction(s)			
<p>The auto populated response reflects information entered on the Organization page (Details tab) of the Applicant’s AMIS account.</p> <p>If the data in this field is not accurate, please contact the CDFI Fund via an AMIS Service Request to have it corrected before the CDFI Certification Application is submitted.</p>			

Field	BI10	Field Type	Picklist
Field Label/Question Text	Can the Applicant meet the CDFI Certification requirements based on its own arm’s-length, on-balance sheet Financial Product or, as allowed, its own direct arm’s-length Financial Services activity?		
Response	Yes No No, the Applicant seeks to use the CDFI Certification provision for Spin-off entities		
<b>Response Instruction(s)</b>			
<p>By arm’s-length, on-balance sheet Financial Product activity, the CDFI Fund means activity involving an eligible Financial Product type(s) that is offered at arm’s-length and for which the entity claiming to provide the product(s) is named as a financing entity of record in the associated transaction closing documents.</p> <p>Meeting all CDFI Certification requirements based on the Applicant’s own direct own direct arm’s-length Financial Product activity for which it is named as a financing entity of record in associated transaction closing documents and, as allowed, its own direct arm’s-length financial services activity includes being able to demonstrate that it had closed such a Financial Product transaction or provided such a Financial Service on or before the first day of its most recently completed full 12 month fiscal year.</p> <p>Select <b>“Yes”</b> only if the Applicant can meet all CDFI Certification requirements based on its own direct arm’s-length sheet Financial Product activity for which it is named as a financing entity of record in associated transaction closing documents and, as allowed, its own direct arm’s-length Financial Services activity.</p> <p>Select <b>“No”</b> if the Applicant cannot meet all CDFI Certification requirements based on its own direct arm’s-length Financial Product activity for which it is named as a financing entity of record in associated transaction closing documents and, as allowed, its own direct arm’s-length Financial Services activity.</p> <p>Select <b>“No, the Applicant seeks to use the CDFI Certification provision for Spin-off entities.”</b> if the Applicant cannot meet all CDFI Certification requirements based on its own direct arm’s-length Financial Product activity for which it is named as a financing entity of record in associated transaction closing documents and, as allowed, its own direct arm’s-length Financial Services activity. But, the Applicant is seeking to use the Spin-Off Entity provision to satisfy the CDFI Certification requirements.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – on-balance sheet Financial Product activity/transaction</li> </ul>			
<p><b>BI10.1 &amp; BI10.2 – Will only appear if the response for the preceding field is “No” or “No, the Applicant seeks to use the CDFI Certification provision for Spin-off entities”.</b></p>			
<p><i>Only if the Applicant answered “No,” complete BI-AFP01 through BI-AFP09 (<a href="#">Section 5.3.3</a>)</i></p>			
<p><i>Only if the Applicant answered “No,” complete BI-AFS01 through BI-AFS04 (<a href="#">Section 5.3.4</a>)</i></p>			

<b>Field</b>	<b>BI10.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<b>Is the Applicant applying for Certification solely to participate in the BG Program and is Controlled by a Certified CDFI?</b>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select <b>“Yes,”</b> if the Applicant will use non-arm’s-length Financial Products or, as allowed, Financial Services activity with a Controlling Certified CDFI to help it meet one or more CDFI Certification requirements.</p> <p>If the response for the preceding field is <b>“No,”</b> and the Applicant is not a Spin-off, it is not a DIHC that does not engage in its own direct eligible Financial Products activity and it is not using the CDFI Certification solely for participation in the CDFI Fund’s BG Program, it cannot be certified as a CDFI.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – on-balance sheet Financial Products activity/transaction</li> <li>• Provision for entities using the CDFI Certification solely for participation in the CDFI Fund’s Bond Guarantee Program</li> <li>• Provision for DIHC(s) that do not engage in their own direct eligible Financial Products activity</li> </ul>			
<i><b>BI12</b> – Will only appear if the response for the preceding field is <b>“Yes”</b>.</i>			
<b>Field</b>	<b>BI10.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<b>Is the Applicant a DIHC that does not engage in its own direct Financial Product or Financial Services activity and is relying on the activity of an Affiliate(s) to meet the CDFI Certification requirements?</b>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select <b>“Yes,”</b> if the Applicant will rely on another eligible entity to help it meet one or more CDFI Certification requirements.</p> <p>If the response for the preceding field is <b>“No,”</b> and the Applicant is not a Spin-off, it is not a DIHC that does not engage in its own direct eligible Financial Products activity and it is not using the CDFI Certification solely for participation in the CDFI Fund’s BG Program, it cannot be certified as a CDFI.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – on-balance sheet Financial Products activity/transaction</li> <li>• Provision for DIHC(s) that do not engage in their own direct eligible Financial Products activity.</li> </ul>			

Field	BI11	Field Type	Picklist
Field Label/Question Text	Has the Applicant completed at least one full 12-month fiscal year since the date of its incorporation/ organization/establishment documentation was filed with or approved by the appropriate authorizing agency?		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select <b>“Yes”</b> only if the Applicant had directly closed at least one eligible Financial Products transaction or directly provided at least one eligible Financial Service on or before the first day of its most recently completed full 12-month fiscal year.</p> <p>While the label/question for this field indicates that the Applicant’s response should reflect whether it has existed for at least one full 12 month fiscal year, the response should actually reflect whether the Applicant has engaged in eligible Financial Products or eligible Financial Services activity for at least one full 12 month fiscal year (i.e., it had directly closed at least one eligible Financial Products transaction or directly provided at least one eligible Financial Service on or before the first day of its most recently completed full 12 month fiscal year).</p> <p>If the Applicant has not been in existence long enough to have completed one full 12-month fiscal year, it must respond <b>“No”</b> to this question.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Products activity/transaction</li> <li>• Key Term – eligible Financial Services activity/Financial Service</li> </ul>			
<i>BI11.1 – will only appear if the response for the preceding field is “No.”</i>			
Field	BI11.1	Field Type	Picklist
Field Label/Question Text	<b>If No</b> , identify the exception(s) to the CDFI Certification requirement that 12 full months must have passed since an entity began its financing activity that the Applicant seeks to use.		
Response	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• Applicant seeks to use the CDFI Certification provision for Spin-off entities.</li> <li>• Applicant is a DIHC that does not engage in its own direct Financial Product or Financial Services activity and is relying on the activity of an Affiliate(s) to meet the CDFI Certification requirements.</li> <li>• Applicant seeks to use the CDFI Certification provision for Spin-off entities AND Applicant is a DIHC that does not engage in its own direct Financial Product or Financial Services activity</li> </ul>		

	<p>and is relying on the activity of an Affiliate(s) to meet the CDFI Certification requirements.</p> <ul style="list-style-type: none"> <li>• Applicant will use the CDFI Certification solely to participate in the BG Program and is Controlled by a Certified CDFI.</li> <li>• Applicant seeks to use the CDFI Certification provision for Spin-off entities AND Applicant will use the CDFI Certification solely to participate in the BG Program and is Controlled by a Certified CDFI.</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the provision(s) the Applicant is seeking to use if it will rely on another eligible entity or if it will use non-arm’s-length Financial Products or Financial Services activity with a Controlling Certified CDFI to meet the requirement that it has engaged in eligible Financial Products or eligible Financial Services activity for at least one full 12-month fiscal year.</p> <p>If the response for the preceding field is “No,” and the Applicant is not a Spin-off, it is not a DIHC that does not engage in its own direct eligible Financial Products activity, and it is not using the CDFI Certification solely for participation in the CDFI Fund’s BG Program, it cannot be certified as a CDFI.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Products activity/transaction</li> <li>• Key Term – eligible Financial Services activity/Financial Service</li> <li>• Spin-off provision</li> <li>• Provision for entities using the CDFI Certification solely for participation in the CDFI Fund’s Bond Guarantee Program</li> <li>• Provision for DIHC(s) that do not engage in their own direct eligible Financial Products activity</li> </ul>			
<b>Field</b>	<b>BI12</b>	<b>Field Type</b>	
<b>Field Label/Question Text</b>	<p><u>If the Applicant seeks to use a CDFI Certification provision for entities seeking CDFI Certification solely for participation in the CDFI Fund’s BG Program:</u></p> <p>Identify the Certified CDFI that Controls the Applicant.</p>		
<b>Response</b>	<p>Select the Certified CDFI Affiliate from Picklist.</p>		
<b>Response Instruction(s)</b>			
<p>Use the look-up function in this field to find a Certified CDFI that Controls the Applicant correct entity and then enter that entity name as the chosen response by selecting it from the look-up results list.</p> <p>Any Certified CDFI that Controls the Applicant must be listed as a related entity via an Affiliate/related entity record in the Affiliates/related entities section on the Organization page (Related tab) in the Applicant’s AMIS account.</p> <p>If the Applicant has more than one Controlling Certified CDFI and is using the CDFI Certification solely for participation in the CDFI Fund’s BG Program, it will present just one of them here. However, each Controlling Certified CDFI relevant to the Applicant’s use of the CDFI Certification solely for</p>			

participation in the CDFI Fund’s BG Program must be presented in the Affiliates section of the Application form.

If the Applicant is not Controlled by a Certified CDFI, it cannot rely on a provision for entities using the CDFI Certification solely for participation in the CDFI Fund’s BG Program to meet the CDFI Certification requirements.

If either the Applicant or a Controlling Certified CDFI has not engaged in eligible Financial Products or eligible Financial Services activity for at least one full 12-month fiscal year, the Applicant cannot rely on a provision for entities using the CDFI Certification solely for participation in the CDFI Fund’s BG Program to meet the CDFI Certification requirements.

**Review the following information before completing this field:**

- Key Term – Control, Controlled, or Controlling
- Provision for entities using the CDFI Certification solely for participation in the CDFI Fund’s Bond Guarantee Program

Field	BI13	Field Type	Look-up
Field Label/Question Text	<p><u>If the Applicant is a DIHC that does not engage directly in the provision of Financial Products or Financial Services:</u> Identify the Affiliate that has completed at least one full 12-month fiscal year prior to submission of the CDFI Certification Application.</p>		
Response	Select the Affiliate from Picklist.		
<b>Response Instruction(s)</b>			

Use the look-up function in this field to find an entity relevant to the DIHC Applicant’s CDFI Certification collective review process that had directly closed at least one eligible Financial Products transaction or directly provided at least one eligible Financial Service on or before the first day of its most recently completed full 12-month fiscal year and then enter that entity’s name as the chosen response by selecting it from the look-up results list.

While the label/question for this field indicates that it is only relevant to DIHC Applicants that do not engage in eligible Financial Products nor eligible Financial Services activity, the field will be completed for any DIHC Applicant that does not engage in eligible Financial Products activity regardless of whether it directly provides any eligible Financial Service(s).

While the label/question for this field indicates that any Affiliate that meets the standard of having been in existence for at least one full 12 month fiscal year can be presented, the identified entity must be one that is relevant to the DIHC Applicant’s CDFI Certification collective review process and that has engaged in eligible Financial Products or eligible Financial Services activity for at least one full 12 month fiscal year.

If at least one entity relevant to the DIHC Applicant’s CDFI Certification collective review process has not existed long enough to have completed one full 12-month fiscal year, it cannot be presented as having been engaged in eligible Financial Products or eligible Financial Services activity for at least one full 12 months fiscal year.

The full 12-month fiscal year timeframe used in connection with this provision is not the Applicant’s fiscal year timeframe but is instead the fiscal year timeframe used by the entity relevant to the Applicant’s CDFI Certification collective review process.

Each entity relevant to the Applicant’s CDFI Certification collective review process must be listed as a related entity via an Affiliate record in the Affiliates section on the Organization page (Related tab) in the Applicant’s AMIS account.

If a DIHC that does not directly engage in its own eligible Financial Products activity does not have at least one entity relevant to its CDFI Certification collective review process that had directly closed at least one eligible Financial Products transaction or directly provided at least one eligible Financial Service on or before the first day of its most recently completed full 12-month fiscal year, that DIHC is not eligible for CDFI Certification.

**Review the following information before completing this field:**

- Key Term – eligible Financial Products activity/transaction
- Key Term – eligible Financial Services activity/Financial Service

Provision for DIHCS that do not engage in their own direct eligible Financial Products activity

***BI13.1** – will only appear if the Applicant has indicated that it is a DIHC that does not directly engage in its own eligible Financial Products activity.*

<b>Field</b>	<b>BI13.1</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Affiliate date of incorporation		
<b>Response</b>	[Auto populated from Applicant’s AMIS account]		
<b>Response Instruction(s)</b>			

The auto populated response reflects information entered in the record for the entity relevant to the Applicant’s CDFI Certification collective review process from the Affiliates section on the Organization page (Related tab) in the Applicant’s AMIS account.

While the label or question for this field indicates that a date of incorporation should be provided, the response should actually reflect the date when the entity’s organizing documents were at least filed with a government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry (e.g., the State in which the entity was legally established, a Tribal government or federal regulator). If the data in this field is not accurate, please contact the CDFI Fund through an AMIS Service Request to have it corrected before the CDFI Certification Application is submitted.

<b>Field</b>	<b>BI14</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Is the CDFI Certification Applicant an Affiliate of a DIHC?		
<b>Response</b>	Yes or No		

Response Instruction(s)			
<p>Select <b>“Yes”</b> if the Applicant is an Affiliate of a Depository Institution Holding Company(ies) (DIHC[s]). If the Applicant is an Affiliate of a DIHC(s), it is subject to the CDFI Certification collective review requirements.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – Affiliate</li> <li>• Key Term – Control, Controlled, or Controlling</li> <li>• Key Term – Depository Institution Holding Company (DIHC)</li> </ul>			
Field	BI15	Field Type	Picklist
Field Label/Question Text	Is the CDFI Certification Applicant a Subsidiary of an IDI?		
Response	Yes or No		
Response Instruction(s)			
<p>Select <b>“Yes”</b> if the Applicant is a Subsidiary of an Insured Depository Institution(s) (IDI[s]). If the Applicant is a Subsidiary of an IDI(s), it is subject to the CDFI Certification collective review requirements.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – Subsidiary</li> <li>• Key Term – Control, Controlled, or Controlling</li> <li>• Key Term – Insured Depository Institution (IDI)</li> </ul>			
Field	BI16	Field Type	Picklist
Field Label/Question Text	Does the Applicant issue stock?		
Response	Yes or No		
Response Instruction(s)			
<p>Select the appropriate response.</p> <p>If the Applicant issues stock, the stock ownership will be assessed to determine if, via stock ownership, the Applicant is Controlled by a DIHC or an IDI and is therefore the Affiliate of a DIHC (via being the Subsidiary of a DIHC) or the Subsidiary of an IDI and, as such, is subject to the CDFI Certification collective review requirements.</p>			

<b>BI16.1</b> – will only appear if the Applicant has indicated that it issues stock.			
<b>Field</b>	<b>BI16.1</b>	<b>Field Type</b>	Attachment
<b>Field Label/Question Text</b>	If “Yes,” attach stock certificate summary report that indicates voting securities held.		
<b>Response</b>	Attach document(s).		
<b>Response Instruction(s)</b>			
Attach the Applicant’s current stock ownership summary report indicating any individuals or entities that own 25% or more of its available voting stock shares.			
<p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p>			
<b>Field</b>	<b>BI17</b>	<b>Field Type</b>	None
<b>Field Label/Question Text</b>	If the Applicant seeks to use the CDFI Certification provision for Spin-off entities:		
<b>BI17.1 through BI17.4</b> – will only appear if the Applicant has indicated that it seeks to use the CDFI Certification provision for Spin-off(s).			
<b>Field</b>	<b>BI17.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Can the Applicant demonstrate that at least one Financial Product it currently offers was transferred (not sold) to the Applicant by at least one Affiliate?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
An eligible Spin-off-related Affiliate is an entity, from which a Spin-off received a transferred (not purchased) portfolio of Financial Products transactions, that is an Affiliate as of the date the CDFI Certification Application using the Spin-off provision is submitted; was an Affiliate when the eligible Financial Products portfolio transfer took place; and was not a Certified CDFI at any point during the 12 months of what would have been, if it was in existence at that time, the Spin-off’s most recently completed fiscal year timeframe whose transferred portfolio included Financial Products transactions it closed at arm’s-length and as a financing entity of record in the associated transaction closing documents.			

Select **“Yes”** only if the Applicant has records that clearly demonstrate that it currently offers Financial Products at least one eligible Financial Products type that is of the same type and has the same purpose of at least one transaction included in a transferred (not purchased) portfolio of Financial Products transactions received from an eligible Spin-off-related Affiliate that would have qualified as an eligible Financial Products transaction for the transferring entity.

If the answer to this question is **“No,”** the Applicant is not eligible to use the CDFI Certification provision for Spin-off entities.

The Applicant must maintain records that clearly demonstrate that all conditions of the Spin-off provision have been met (including documentation that evidences that any Financial Products portfolio it received from an entity it is claiming as an eligible Spin-off-related Affiliate was transferred to it at no cost). The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, or other information related to an entity’s eligibility to use the CDFI Certification Spin-off provision at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

**Review the following information before completing this field:**

- Key Term – eligible Financial Products activity/transaction
- Key Term – eligible Financial Services activity/Financial Service
- Spin-off provision

Field	BI17.2	Field Type	Picklist
Field Label/Question Text	Can the Applicant demonstrate that at least one of its currently offered, transferred Financial Products has been offered by the Applicant or an original entity from which it received the Financial Product activity for at least one full fiscal year prior to submission of this Application?		
Response	Yes or No		
<b>Response Instruction(s)</b>			

An eligible Spin-off-related Affiliate is an entity, from which a Spin-off received a transferred (not purchased) portfolio of Financial Products transactions, that is an Affiliate as of the date the CDFI Certification Application using the Spin-off provision is submitted; was an Affiliate when the eligible Financial Products portfolio transfer took place; and was not a Certified CDFI at any point during the 12 months of what would have been, if it was in existence at that time, the Spin-off’s most recently completed fiscal year timeframe whose transferred portfolio included Financial Products transactions it closed at arm’s-length and as a financing entity of record in the associated transaction closing documents.

Select **“Yes”** only if the Applicant has records that clearly demonstrate that it currently offers in the form of eligible Financial Products activity at least one eligible Financial Products type that is of the same type and has the same purpose as a Financial Products included in a transferred (not purchased) portfolio of Financial Products transactions received from an eligible Spin-off-related Affiliate and which the transferring Affiliate had a history of closing at arm’s-length and as a financing entity of record in the associated transaction closing documents for at least the 12 full calendar months

completed immediately prior to the relevant Financial Products portfolio transfer date (i.e., the eligible Spin-off-related Affiliate must have closed at least one transaction involving the applicable eligible Financial Products type at arm’s-length and as a financing entity of record in the associated transaction closing documents on or before the first day of the 12 full calendar months completed immediately prior to the relevant Financial Products portfolio transfer date).

If the answer to this question is “No,” the Applicant is not eligible to use the CDFI Certification provision for Spin-off entities.

The Applicant must maintain records that clearly demonstrate that all conditions of the Spin-off provision have been met (including, but not limited to, documentation that evidences that any Financial Products portfolio it received from an entity it is claiming as an eligible Spin-off-related Affiliate was transferred to it at no cost). The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, or other information related to an entity’s eligibility to use the CDFI Certification Spin-off provision at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

**Review the following information before completing this field:**

- Key Term – eligible Financial Products activity/transaction
- Key Term – eligible Financial Services activity/Financial Service
- Spin-off provision

Field	BI17.3	Field Type	Picklist
Field Label/Question Text	After the receipt of any transferred Financial Products, can the Applicant demonstrate that it has closed at least one such Financial Product using its own capital?		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p>An eligible Spin-off-related Affiliate is the following: (1) an entity from which a Spin-off received a transferred (not purchased) portfolio of Financial Products transactions; (2) an Affiliate as of the date when the CDFI Certification Application using the Spin-off provision is submitted; (3) an Affiliate when the eligible Financial Products portfolio transfer took place; and (4) was not a Certified CDFI at any point during the 12 months of what would have been, if it was in existence at that time, the Spin-off’s most recently completed fiscal year timeframe. The transferred portfolio must include Financial Products transactions that the Spin-off related Affiliate closed at arm’s-length and was the financing entity of record in the associated transaction closing documents.</p> <p>Select “Yes” only if the Applicant has records that clearly demonstrate that at any time during the 12 full calendar months completed immediately prior to submission of its CDFI Certification Application (even if it was before it received an eligible transferred Financial Products portfolio), it demonstrated the following: 1) It closed at least one eligible Financial Products transaction, which is of the same eligible Financial Products type and same purpose of at least one transaction included in a Financial Products portfolio transferred to it; 2) The transfer was at no cost by an eligible Spin-off-related Affiliate; and 3) The transferring Affiliate had itself closed a transaction at arm’s-length and as a</p>			

financing entity of record in the associated transaction’s closing documents prior to the relevant Financial Products portfolio transfer date.

If the answer to this question is “No,” the Applicant is not eligible to use the CDFI Certification provision for Spin-off entities.

While the label/question for this field indicates that the Spin-off must have closed the qualifying Financial Products transaction(s) AFTER it received an eligible transferred Financial Products portfolio, the qualifying transaction(s) can have closed at any time during the 12 full calendar months immediately completed prior to submission of the Spin-off’s CDFI Certification Application, even if it was before it received an eligible transferred Financial Products portfolio.

The Applicant must maintain records that clearly demonstrate that all conditions of the Spin-off provision have been met including, but not limited to: 1) documentation that evidences that any Financial Products portfolio it received from an entity it is claiming as an eligible Spin-off-related Affiliate was transferred to it at no cost; 2) closing documents showing that it has closed at least one eligible Financial Products transaction, which is of the same eligible Financial Products type and has the same purpose of at least one transaction included in a Financial Products portfolio transferred to it at no cost by an eligible Spin-off-related Affiliate; 3) the transferring Affiliate had itself closed transaction(s) at arm’s-length; and as a financing entity of record in the associated transaction closing documents at some point prior to the relevant Financial Products portfolio transfer date.

The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, or other information related to an entity’s eligibility to use the CDFI Certification Spin-off provision at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

**Review the following information before completing this field:**

- Key Term – eligible Financial Products activity/transaction
- Key Term – eligible Financial Services activity/Financial Service
- Spin-off provision

Field	BI17.4	Field Type	Picklist
Field Label/Question Text	Can the Applicant demonstrate that it, or an Affiliate from which it received Financial Product activity, an acceptable primary mission has been in place for at least the immediate six months completed prior to submission of the CDFI Certification Application?		
Response	Yes or No		
<b>Response Instruction(s)</b>			
An eligible Spin-off-related Affiliate is an entity from which a Spin-off received a transferred (not purchased) portfolio of Financial Products transactions that is an Affiliate as of the date the CDFI Certification Application using the Spin-off provision is submitted; was an Affiliate when the eligible Financial Products portfolio transfer took place; and was not a Certified CDFI at any point during the 12 months of what would have been, if it was in existence at that time, the Spin-off’s most recently completed fiscal year timeframe whose transferred portfolio included Financial Products transactions			

it closed at arm’s-length and as a financing entity of record in the associated transaction closing documents.  
 Select **“Yes”** only if the Applicant has records that clearly demonstrate that it or at least one eligible Spin-off-related Affiliate has had the promotion of community development as its primary mission for at least the six full calendar months immediately prior to submission of the CDFI Certification Application.

If the answer to this question is **“No,”** the Applicant is not eligible to use the CDFI Certification provision for Spin-off entities.

The Applicant must maintain records that clearly demonstrate that all conditions of the Spin-off provision have been met (including, but not limited to, documentation that evidences that any Financial Products portfolio it received from an entity it is claiming as an eligible Spin-off-related Affiliate was transferred to it at no cost). The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, or other information related to an entity’s eligibility to use the CDFI Certification Spin-off provision at any time within five years after the CDFI Certification Application, including during the Application review process.

**Review the following information before completing this field:**

- Key Term – eligible Financial Products activity/transaction
- Key Term – eligible Financial Service activity/Financial Service
- Spin-off provision
- Primary Mission requirements

Field	BI18	Field Type	Picklist
Field Label/Question Text	Does the Applicant have a Controlling Entity or any Affiliate(s) that engage in the provision of Financial Products or Financial Services?		
Response	Yes or No		
<b>Response Instruction(s)</b>			

Select **“Yes”** if the Applicant is either Controlled by another entity(ies), even if the Controlling entity(ies) does not engage in any eligible Financial Products or eligible Financial Services activity, or if the Applicant has an Affiliate(s) that engages in eligible Financial Products or eligible Financial Services activity, unless the only relevant Controlling entity or Affiliate is a tribal government.

If **“Yes,”** the [Affiliates - Basic Information](#) – sub-section must be completed.

Each Affiliate of the Applicant, other than a tribal government, that Controls the Applicant or that directly engages in any eligible Financial Products or eligible Financial Services activity must meet applicable CDFI Certification Primary Mission-related requirements, in accordance, in some cases with the Primary Mission requirements for an entity relevant to the CDFI Certification collective review process if the Applicant is subject to that review process.

**Review the following information before completing this field:**

- Key Term – Affiliate
- Key Term – Control, Controlled, or Controlling

<ul style="list-style-type: none"> <li>• Key Term – eligible Financial Products activity/transaction</li> <li>• Key Term – eligible Financial Services activity/Financial Service</li> </ul>			
Field	BI19	Field Type	Attachment
Field Label/Question Text	Attach a copy of the Applicant’s signed and dated board/owner-approved document (bylaws, operating agreement, partnership agreement, or similar documentation).		
Response	Attach documentation.		
Response Instruction(s)			
<p>Attach a copy of the Applicant’s current binding governance document (bylaws, operating agreement, partnership agreement, or similar) with clear acceptable evidence (in one of the ways accepted by the CDFI Fund) of its approval by the Applicant’s governing leadership and of its approval date.</p> <p>By board/owner-approved, the CDFI Fund means governing leadership-approved.</p> <p>If the documentation provided does not demonstrate that it is binding via clear acceptable evidence (in one of the ways allowed by the CDFI Fund) of its approval by the Applicant’s governing leadership and its approval date, the document will not be considered valid, which may result in the decline of the CDFI Certification Application. For information on evidence of governing leadership approval that is accepted for CDFI Certification purposes, see <a href="#">“Evidence that a Document is Governing Leadership-Approved”</a> in the CDFI Certification – Documentation Requirements section of this guidance manual.</p> <div style="border: 1px solid black; background-color: #fff9c4; padding: 5px; margin: 5px 0;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div> <p>The Applicant’s entity name must show clearly in the governance document and must match its current entity name as it appears in its AMIS account or documentation filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry linking the entity name in the governance document to the current entity name in AMIS must be provided.</p> <p>The effective date of the current governance document (bylaws, operating agreement, partnership agreement, or similar) must be as of or prior to the date of submission of the CDFI Certification Application.</p> <p>If, in accordance with an exception made by an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry, the Applicant does not have a governance document (bylaws, operating agreement, partnership agreement, or a similar document), it must provide a document with the following required elements:</p> <ul style="list-style-type: none"> <li>• clearly worded and complete explanation of the situation,</li> <li>• signature of a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process),</li> </ul>			

<ul style="list-style-type: none"> <li>• date of signature by the governing leader(s) or official Corporate Secretary, and</li> <li>• documentation from the relevant government or tribal government agency that verifies the exception.</li> </ul> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – governing leadership</li> <li>• CDFI Certification – documentation requirements</li> </ul>			
Field	BI20	Field Type	Picklist
Field Label/Question Text	Indicate how governing or managing board/owner approval of the Applicant’s bylaws, partnership agreement, or similar document and the date of approval is evidenced in the attached documentation.		
Response	<p>Select one:</p> <ul style="list-style-type: none"> <li>A. Statement, validly signed by governing leader(s) or official Corporate Secretary (i.e. signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified, indicates the document was approved by the governing leadership with its approval date.</li> <li>B. Statement, validly signed by governing leader(s)/official Corporation Secretary (i.e. signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document but clearly references it, indicates the document or the governing leadership decision it records was approve by the governing leadership and specifies its approval date.</li> <li>C. Document evidences that it was filed with a government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.</li> <li>D. Governing leadership meeting minutes confirm government leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by governing leader(s)/official Corporate Secretary (i.e. signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.</li> <li>E. Governing leadership meeting minutes confirm governing leadership approval of the document or the governing leadership decision it records and meeting date and a statement validly signed by governing leader(s) or official Corporate Secretary (i.e. signed with a verifiable signature – either an actual manual signature or an electronic signature that involved</li> </ul>		

a formal electronic signer authentication process) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.

### Response Instruction(s)

Indicate how the Applicant's governance documentation (bylaws, operating agreement, partnership agreement, or similar) evidences its status as a binding document of record (i.e., that it is governing leadership-approved) and its effective date by selecting the option below that identifies how the provided documentation demonstrates such and selecting the response option in the data field that is preceded by the same letter.

The documentation provided must show the correct name of the Applicant, which must match the Applicant's current entity name as it appears in its AMIS account. The documentation must include evidence that the relevant document is binding via clear acceptable evidence (in one of the ways allowed by the CDFI Fund) of its approval by the Applicant's governing leadership and its approval date or the document will not be considered valid, which may result in the CDFI Certification Application being declined. For information on evidence of governing leadership approval accepted for CDFI Certification purposes, see Evidence that a Document is Governing Leadership-Approved in the Basic Information section of this guidance manual.

The effective date of the governance document provided must be as of or prior to the submission date of the CDFI Certification Application.

**Select option A** if the Applicant does not have a governance document (bylaws, operating agreement, partnership agreement, or similar) and it is providing a document that explains why it does not have that type of documentation, that is signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) and that includes the governing leader's signature date.

**The letter response options in the Application form represent each of the following responses which correspond with applicable letter:**

- A. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified that indicates the document was approved by the governing leadership and its approval date.
- B. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document, but clearly references it, indicating that the document or the governing leadership decision it records was approved by the governing leadership and specifies its approval date.
- C. Document provides evidence that it was filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.

- D. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it recorded, the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.
- E. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it recorded, the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.

Field	BI21	Field Type	Attachment
<b>Field Label/Question Text</b>	If governing or managing board, owner approval or the date of approval of the Applicant’s bylaws, partnership agreement, or similar document is not evidenced within the relevant document itself: Attach additional documentation that evidences approval.		
<b>Response</b>	Attach documentation		
<b>Response Instruction(s)</b>			

If the governance documentation attached above does not include all needed evidence to demonstrate the clear approval of the Applicant’s governance document (bylaws, operating agreement, partnership agreement, or similar) by its governing leadership and its approval date in one of the ways accepted by the CDFI Fund, attach any additional documentation needed for that purpose. For information on evidence of governing leadership approval that is accepted for CDFI Certification purposes, see “[Evidence that a Document is Governing Leadership-Approved](#)” in the CDFI Certification – Documentation Requirements section of this guidance manual.

**NOTE:** CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.

The Applicant’s entity name must show clearly in the governance document and must match its current entity name as it appears in its AMIS account. If the Applicant’s entity name in the governance document does not match the current entity’s name in AMIS, then the Applicant must provide documentation demonstrating the link between the two different names. Documentation may include any document(s) filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.

The documentation provided must evidence governing leadership approval of the relevant document and its approval date in one of the ways accepted by the CDFI Fund or the document will not be considered valid, which may result in the decline of the CDFI Certification Application.

If, in accordance with an exception made by an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry, the Applicant does not have a governance document (bylaws, operating agreement, partnership agreement, or similar), then it must provide a document with the following required elements:

- clearly worded and complete explanation of the situation,
- signature of a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process),
- date of signature by the governing leader(s) or official Corporate Secretary, and
- documentation from the relevant government or tribal government agency that verifies the exception.

<b>Field</b>	<b>BI22</b>	<b>Field Type</b>	Look-up
<b>Field Label/Question Text</b>	Designate an Authorized Representative for the CDFI Certification Application.		
<b>Response</b>	Select Authorized Representative		
<b>Response Instruction(s)</b>			
<p>Use the look-up function in this field to find an Authorized Representative from among the contacts identified in the Applicant’s AMIS account and then enter an Authorized Representative’s name as the chosen response by selecting it from the look-up results list.</p> <p>An Authorized Representative is an employee or officer who is authorized to sign legal documents on behalf of an entity and bind that entity accordingly. Consultants working on behalf of an entity cannot be designated as Authorized Representatives and may not sign the CDFI Certification Application.</p> <p>The Applicant should make sure that the Authorized Representative information in the Contacts section on the Organization page (Related tab) in its AMIS account is valid and up to date. If any entry in the Contacts list is not valid or accurate, use AMIS guidance to correct it before the CDFI Certification Application is submitted.</p>			
<b>Field</b>	<b>BI23</b>	<b>Field Type</b>	Look-up
<b>Field Label/Question Text</b>	Designate a Point of Contact for the CDFI Certification Application.		
<b>Response</b>	Select Point of Contact		
<b>Response Instruction(s)</b>			
<p>Use the look-up function in this field to find an Authorized Representative from among the contacts identified in use the look-up function in this field to find a contact among the contacts identified in</p>			

the Applicant’s AMIS account. Then enter a contact’s name as the chosen response by selecting it from the look-up results list.

The Applicant should make sure that the information in the Contacts section on the Organization page (Related tab) in its AMIS account is valid and up to date. If any entry in the Contacts list is not valid or accurate, use AMIS guidance to correct it before the CDFI Certification Application is submitted.

### 5.2.3. Applicant – Board Governing Leadership and Executive Staff Demographic Information

Provide the following information about the members of the Applicant’s governing leadership and Executive Staff.<sup>4</sup> Governing leadership or executive staff members who identify as a member of more than one race and ethnicity may be counted under each race and ethnicity for which they identify.

#### **Applicant – Basic Information –Demographic Information (BI-DI)-Data Fields**

<b>Field</b>	<b>BI-DI01</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the total number of governing leadership members.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Enter the total number of governing leadership members.			
<b>Field</b>	<b>BI-DI02</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the total number of governing leadership members who identify as a member of a minority population.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
For purposes of this Application, the CDFI Fund relies on definitions established by the <a href="#">1997 Office of Management and Budget (OMB) standards on race and ethnicity</a> .			
The CDFI Fund defines “Minority” as “any Black American, Hispanic American, Asian American, Native American, Native Alaskan, Native Hawaiian, or Pacific Islander.”			

<sup>4</sup> “Executive Staff” means the chief executive and all executive officers or senior decision-makers that have a reporting relationship to the chief executive or the governing leadership.

<b>Field</b>	<b>BI-DI03</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Percentage of governing leadership members who identify as a member of a minority population.		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account.]		
<b>Response Instruction(s)</b>			
Total number of governing leadership members who identify as a member of a minority population / Total number of governing leadership members = Percentage of governing leadership members who identify as a member of a minority population.			
<b>Field</b>	<b>BI-DI03.1</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the number of governing leadership members who identify as Black.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Enter the number of governing leadership members who identify as Black.			
<b>Field</b>	<b>BI-DI03.2</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Percentage of governing leadership members who identify as Black.		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account.]		
<b>Response Instruction(s)</b>			
The number of governing leadership identified as Black/ Total number of governing leadership members = Percentage of governing leadership members who identify as Black.			
<b>Field</b>	<b>BI-DI03.3</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the number of governing leadership members who identify as Asian.		
<b>Response</b>	Enter number.		

Response Instruction(s)			
Enter the number of governing leadership members who identify as Asian.			
Field	BI-DI03.4	Field Type	Auto populated
Field Label/Question Text	Percentage of governing leadership members who identify as Asian.		
Response	[Auto populated from the Applicant’s AMIS account.]		
Response Instruction(s)			
The number of governing leadership members identified as Asian / Total number of governing leadership members = Percentage of governing leadership members who identify as Asian.			
Field	BI-DI03.5	Field Type	Numeric
Field Label/Question Text	Indicate the number of governing leadership members who identify as Native American.		
Response	Enter number.		
Response Instruction(s)			
Enter the number of governing leadership members who identify as Native American.			
Field	BI-DI03.6	Field Type	Auto populated
Field Label/Question Text	Percentage of governing leadership members who identify as Native American.		
Response	[Auto populated from the Applicant’s AMIS account]		
Response Instruction(s)			
The number of governing leadership members identified as Native American / Total number of governing leadership members = Percentage of governing leadership members who identify as Native American.			
Field	BI-DI03.7	Field Type	Numeric
Field Label/Question Text	Indicate the number of governing leadership members who identify as Native Alaskan.		

<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Enter the number of governing leadership members who identify as Native Alaskan.			
<b>Field</b>	<b>BI-DI03.8</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Percentage of governing leadership members who identify as Native Alaskan.		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		
<b>Response Instruction(s)</b>			
The number of governing leadership members identified as Native Alaskan / Total number of governing leadership members = Percentage of governing leadership members who identify as Native Alaskan.			
<b>Field</b>	<b>BI-DI03.9</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the number of governing leadership members who identify as Native Hawaiian.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Enter the number of governing leadership members who identify as Native Hawaiian.			
<b>Field</b>	<b>BI-DI03.10</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Percentage of governing leadership members who identify as Native Hawaiian.		
<b>Response</b>	[Auto calculated]		
<b>Response Instruction(s)</b>			
The number of governing leadership members identified as Native Hawaiian / Total number of governing leadership members = Percentage of governing leadership members who identify as Native Hawaiian.			

<b>Field</b>	<b>BI-DI03.11</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the number of governing leadership members who identify as Pacific Islander.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Enter the number of governing leadership members who identify as Pacific Islander.			
<b>Field</b>	<b>BI-DI03.12</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Percentage of governing leadership members who identify as Pacific Islander		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		
<b>Response Instruction(s)</b>			
The number of governing leadership members identified as Pacific Islander / Total number of governing leadership members = Percentage of governing leadership members who identify as Pacific Islander.			
<b>Field</b>	<b>BI-DI03.13</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the number of governing leadership members who identify as Hispanic.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Enter the number of governing leadership members who identify as Hispanic.			
<b>Field</b>	<b>BI-DI03.14</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Percentage of governing leadership members who identify as Hispanic.		
<b>Response</b>	[Auto calculated]		
<b>Response Instruction(s)</b>			
The number of governing leadership members identified as Hispanic / Total number of governing leadership members = Percentage of governing leadership members who identify as Hispanic.			

<b>Field</b>	<b>BI-DI04</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the number of governing leadership members who identify as Non-Hispanic White.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Enter the number of governing leadership members identified as Non-Hispanic White.			
<b>Field</b>	<b>BI-DI05</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Percentage of governing leadership members who identify as Non-Hispanic White.		
<b>Response</b>	[Auto calculated]		
<b>Response Instruction(s)</b>			
The number of governing leadership members identified as Non-Hispanic White / Total number of governing leadership members = Percentage of governing leadership members who identify as Non-Hispanic White.			
<b>Field</b>	<b>BI-DI06</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the number of governing leadership members whose race and ethnicity are not known or who prefer not to say.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Enter the number of governing leadership members whose ethnicity are not known or who prefer not to say.			
<b>Field</b>	<b>BI-DI07</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Percentage of governing leadership members whose race and ethnicity are not known or who prefer not to say.		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		

Response Instruction(s)			
The number of governing leadership members whose ethnicity are not known or who prefer not to say / Total number of governing leadership members = Percentage of governing leadership members whose race and ethnicity are not known or who prefer not to say.			
Field	BI-DI08	Field Type	Numeric
Field Label/Question Text	Indicate the number of governing leadership members who identify as female.		
Response	Enter number.		
Response Instruction(s)			
Enter the number of governing leadership members who identify as female.			
Field	BI-DI09	Field Type	Auto populated
Field Label/Question Text	Percentage of governing leadership members who identify as female.		
Response	[Auto calculated]		
Response Instruction(s)			
The number of governing leadership members identified as female / Total number of governing leadership members = Percentage of governing leadership members who identify as female.			
Field	BI-DI10	Field Type	Numeric
Field Label/Question Text	Indicate the number of governing leadership members who identify as male.		
Response	Enter number.		
Response Instruction(s)			
Enter the number of governing leadership members who identify as male.			
Field	BI-DI11	Field Type	Auto populated
Field Label/Question Text	Percentage of governing leadership members who identify as male.		
Response	[Auto calculated]		

Response Instruction(s)			
The number of governing leadership members identified as male / Total number of governing leadership members = Percentage of governing leadership members who identify as male.			
Field	BI-DI12	Field Type	Numeric
Field Label/Question Text	Indicate the total number of Executive Staff.		
Response	Enter number.		
Response Instruction(s)			
Enter the total number of Executive Staff.			
Field	BI-DI13	Field Type	Numeric
Field Label/Question Text	Indicate the total number of Executive Staff who identify as a member of a minority population.		
Response	Enter number.		
Response Instruction(s)			
Enter the total number of Executive Staff who identify as a member of the minority population.			
Field	BI-DI14	Field Type	Auto populated
Field Label/Question Text	Percentage of Executive Staff who identify as a member of a minority population.		
Response	[Auto calculated]		
Response Instruction(s)			
The total number of Executive Staff identify as a minority population / Total number of Executive Staff = Percentage of Executive Staff who identify as a minority population.			
Field	BI-DI14.1	Field Type	Numeric
Field Label/Question Text	Indicate the number of Executive Staff who identify as Black.		
Response	Enter number.		

Response Instruction(s)			
Enter the number of Executive Staff who identify as Black.			
Field	BI-DI14.2	Field Type	Auto populated
Field Label/Question Text	Percentage of Executive Staff who identify as Black.		
Response	[Auto calculated]		
Response Instruction(s)			
The number of Executive Staff who identify as Black / Total number of Executive Staff = Percentage of Executive Staff who identify as Black.			
Field	BI-DI14.3	Field Type	Numeric
Field Label/Question Text	Indicate the number of Executive Staff who identify as Asian.		
Response	Enter number.		
Response Instruction(s)			
Enter the number of Executive Staff who identify as Asian.			
Field	BI-DI14.4	Field Type	Auto populated
Field Label/Question Text	Percentage of Executive Staff who identify as Asian.		
Response	[Auto calculated]		
Response Instruction(s)			
The number of Executive Staff who identify as Asian / Total number of Executive Staff = Percentage of Executive Staff who identify as Asian.			
Field	BI-DI14.5	Field Type	Numeric
Field Label/Question Text	Indicate the number of Executive Staff who identify as Native American.		
Response	Enter number.		

Response Instruction(s)			
Enter the number of Executive Staff who identify as Native American.			
Field	BI-DI14.6	Field Type	Auto populated
Field Label/Question Text	Percentage of Executive Staff who identify as Native American.		
Response	[Auto calculated]		
Response Instruction(s)			
The number of Executive Staff who identify as Native American / Total number of Executive Staff = Percentage of Executive Staff who identify as Native American.			
Field	BI-DI14.7	Field Type	Numeric
Field Label/Question Text	Indicate the number of Executive Staff who identify as Native Alaskan.		
Response	Enter number.		
Response Instruction(s)			
Enter the number of Executive Staff who identify as Native Alaskan.			
Field	BI-DI14.8	Field Type	Auto populated
Field Label/Question Text	Percentage of Executive Staff who identify as Native Alaskan.		
Response	[Auto calculated]		
Response Instruction(s)			
The number of Executive Staff who identify as Native Alaskan / Total number of Executive Staff = Percentage of Executive Staff who identify as Native Alaskan.			
Field	BI-DI14.9	Field Type	Numeric
Field Label/Question Text	Indicate the number of Executive Staff who identify as Native Hawaiian.		
Response	Enter number.		

<b>Response Instruction(s)</b>			
Enter the number of Executive Staff who identify as Native Hawaiian.			
<b>Field</b>	<b>BI-DI14.10</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Percentage of Executive Staff who identify as Native Hawaiian.		
<b>Response</b>	[Auto calculated]		
<b>Response Instruction(s)</b>			
The number of Executive Staff who identify as Native Hawaiian / Total number of Executive Staff = Percentage of Executive Staff who identify as Native Hawaiian.			
<b>Field</b>	<b>BI-DI14.11</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the number of Executive Staff who identify as Pacific Islander.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Enter the number of Executive Staff who identify as Pacific Islander.			
<b>Field</b>	<b>BI-DI14.12</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Percentage of Executive Staff who identify as Pacific Islander.		
<b>Response</b>	[Auto calculated]		
<b>Response Instruction(s)</b>			
The number of Executive Staff who identify as Pacific Islander / Total number of Executive Staff = Percentage of Executive Staff who identify as a Pacific Islander.			
<b>Field</b>	<b>BI-DI14.13</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the number of Executive Staff who identify as Hispanic.		
<b>Response</b>	Enter number.		

Response Instruction(s)			
Enter the number of Executive Staff who identify as Hispanic.			
Field	BI-DI14.14	Field Type	Auto populated
Field Label/Question Text	Percentage of Executive Staff who identify as Hispanic.		
Response	[Auto calculated]		
Response Instruction(s)			
The number of Executive Staff identify as Hispanic / Total number of Executive Staff = Percentage of Executive Staff who identify as Hispanic.			
Field	BI-DI15	Field Type	Numeric
Field Label/Question Text	Indicate the number of Executive Staff who identify as Non-Hispanic White.		
Response	Enter number.		
Response Instruction(s)			
Enter the number of Executive Staff who identify as Non-Hispanic White.			
Field	BI-DI16	Field Type	Auto populated
Field Label/Question Text	Percentage of Executive Staff who identify as Non-Hispanic White.		
Response	[Auto calculated]		
Response Instruction(s)			
The number of Executive Staff who identify as Non-Hispanic White /Total number of Executive Staff = Percentage of Executive Staff who identify as Non-Hispanic White.			
Field	BI-DI17	Field Type	Numeric
Field Label/Question Text	Indicate the number of Executive Staff whose race and ethnicity are not known or who prefer not to say.		
Response	Enter number.		

Response Instruction(s)			
Enter the number of Executive Staff whose race and ethnicity are not known or who prefer not to say.			
Field	BI-DI18	Field Type	Auto populated
Field Label/Question Text	Percentage of Executive Staff whose race and ethnicity are not known or who prefer not to say.		
Response	[Auto calculated]		
Response Instruction(s)			
The number of Executive Staff whose race and ethnicity are not known or who prefer not to say / Total number of Executive Staff = Percentage of Executive Staff whose race and ethnicity are not known or who prefer not to say.			
Field	BI-DI19	Field Type	Numeric
Field Label/Question Text	Indicate the number of Executive Staff who identify as female.		
Response	Enter number.		
Response Instruction(s)			
Enter the number of Executive Staff who identify as female.			
Field	BI-DI20	Field Type	Auto populated
Field Label/Question Text	Percentage of Executive Staff who identify as female.		
Response	[Auto calculated]		
Response Instruction(s)			
The number of Executive Staff who identify as female / Total number of Executive Staff = Percentage of Executive Staff who identify as female.			
Field	BI-DI21	Field Type	Numeric
Field Label/Question Text	Indicate the number of Executive Staff who identify as male.		
Response	Enter number.		

Response Instruction(s)			
Enter the number of Executive Staff who identify as male.			
Field	BI-DI22	Field Type	Auto populated
Field Label/Question Text	Percentage of Executive Staff who identify as male		
Response	[Auto calculated]		
Response Instruction(s)			
The number of Executive Staff who identify as male / Total number of Executive Staff = Percentage of Executive Staff who identify as male			
Field	BI-DI23	Field Type	Picklist
Field Label/Question Text	Indicate the race/ethnicity of the Applicant’s Chief Executive Officer/Executive Director.		
Response	Select all that apply: <ul style="list-style-type: none"> <li>• Non-Hispanic White</li> <li>• Black</li> <li>• Asian</li> <li>• Native American</li> <li>• Native Alaskan</li> <li>• Native Hawaiian</li> <li>• Pacific Islander</li> <li>• Hispanic</li> <li>• Prefer not to say</li> </ul>		
Response Instruction(s)			
Identify the race/ethnicity of the Applicant’s Chief Executive Officer/Executive Director.			
Field	BI-DI24	Field Type	Picklist
Field Label/Question Text	Indicate the sex of the Applicant’s Chief Executive Officer/ Executive Director		
Response	Select one: <ul style="list-style-type: none"> <li>• Female</li> <li>• Male</li> </ul>		
Response Instruction(s)			
Identify the sex of the Applicant’s Chief Executive Officer/Executive Director.			

### 5.2.4. Affiliates – Basic Information

#### **Affiliates – Basic Information – (BI-A) Data Fields**

<b>Field</b>	<b>BI-A01</b>	<b>Field Type</b>	Look-up
<b>Field Label/Question Text</b>	Affiliate – Entity Name		
<b>Response</b>	Select the Affiliate from Picklist.		
<b>Response Instruction(s)</b>			
<p>Select the name of the Affiliate or other entity relevant to the Applicant’s CDFI Certification review. While the label for this data field indicates the Basic Information – Affiliates section only pertains to Affiliates, it will be <b>completed for each entity</b> relevant to the Applicant’s CDFI Certification review, even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p> <p>A record for each entity relevant to the Applicant’s CDFI Certification review must be created in the Affiliates/related entities section of the Applicant’s AMIS account.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – Affiliate</li> <li>• Key Term – Control, Controlled, or Controlling</li> <li>• Key Term – eligible financial product activity/transaction</li> <li>• Key Term – eligible Financial Services activity/ Financial Services</li> <li>• CDFI Certification Primary Mission requirements</li> <li>• CDFI Certification collective review provision</li> <li>• CDFI Certification Spin-off provision</li> <li>• CDFI Certification provision for entities using the CDFI Certification solely for participation in the CDFI Fund’s Bond Guarantee Program</li> </ul>			
<b>Response Instruction(s)</b>			
<p>For information on how to create an Affiliates/related entities record in AMIS, see the “Add/Update Affiliates section of the Getting Started – Navigating AMIS Training Manual” available at: <a href="https://www.cdfifund.gov/programs-training/certification/cdfi/apply-step">https://www.cdfifund.gov/programs-training/certification/cdfi/apply-step</a>. (Disregard the information in the training manual indicating that Affiliates/related entities records only need to be created by regulated entities.)</p>			
<b>Field</b>	<b>BI-A02</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Affiliate – EIN		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account]		

Response Instruction(s)			
<p>The EIN for the identified Affiliate or other entity relevant to the Applicant’s CDFI Certification review will auto-populate.</p> <p>While the label for this data field indicates it only pertains to Affiliates, it is <b>completed for each entity</b> relevant to the Applicant’s CDFI Certification review, even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p>			
Field	BI-A03	Field Type	Auto populated
Field Label/Question Text	Affiliate – Date of Incorporation/Organization/Establishment		
Response	[Auto populated from the Applicant’s AMIS account]		
Response Instruction(s)			
<p>The date of incorporation/ organization/establishment for the identified Affiliate or other entity relevant to the Applicant’s CDFI Certification review will auto-populate.</p> <p>The date of incorporation/ organization/establishment is the date when the entity’s organizing documents were at least filed with a government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry (e.g., the State in which the entity was legally established, a Tribal government or federal regulator).</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is <b>completed for each entity</b> relevant to the Applicant’s CDFI Certification review, even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p>			
Field	BI-A04	Field Type	Picklist
Field Label/Question Text	Is the Affiliate a Certified CDFI?		
Response	Yes or No		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether the identified Affiliate or other entity relevant to the Applicant’s CDFI Certification review is a Certified CDFI as of the date the CDFI Certification Application is submitted.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review, even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p> <p>Affiliates or other entities related to the one seeking to obtain or maintain the CDFI Certification are assessed as part of the primary entity under review’s compliance with the CDFI Certification Primary Mission requirements. If Affiliates or other entities are Certified CDFI(s) when the review of that other entity is being conducted and presumed to meet all Primary Mission requirements in connection with</p>			

the primary entity under review’s CDFI Certification, then the Primary Mission section of the CDFI Certification Application <b>does not</b> have to be completed for any such Affiliate/other related entity.			
<b>Field</b>	<b>BI-A04.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant seek to use the CDFI Certification provision for BG Program participation solely to participate in the CDFI Fund’s BG Program?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the identified Affiliate or other entity relevant to the Applicant’s CDFI Certification review Controls the Applicant.</p> <p>Applicants must make sure that the response in this field is consistent with responses in other fields in the CDFI Certification Application that address whether a CDFI Certification provision for entities using the CDFI Certification for the sole purpose of participating in the CDFI Fund’s BG Program will be utilized.</p> <p>Inconsistent responses regarding a CDFI Certification provision for entities using the CDFI Certification for the sole purpose of participating in the CDFI Fund’s BG Program will be utilized may result in the decline of the CDFI Certification Application.</p> <p>An Applicant, seeking to use the CDFI Certification for the sole purpose of participating in the CDFI Fund’s BG Program, that meets the eligibility standards for a CDFI Certification provision(s) for such entities will be allowed to rely on a Controlling Certified CDFI or to use non-arm’s-length financial product or, as applicable and allowed, financial services activity with a Controlling Certified CDFI to help it meet the CDFI Certification Financing Entity, Target Market, or Development Services requirements.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• CDFI Certification provision for entities using the CDFI Certification solely for participation in the CDFI Fund’s Bond Guarantee Program</li> </ul>			
<b>Field</b>	<b>BI-A04.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Affiliate Control the Applicant?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the identified entity is an Affiliate that Controls the Applicant.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p>			

<b>Review the following information before completing this field:</b>			
<ul style="list-style-type: none"> <li>• Key Term – Affiliate</li> <li>• Key Term – Control, Controlled, or Controlling</li> </ul>			
<b>Field</b>	<b>BI-A05</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Is the Affiliate a certified Community Development Entity (CDE)?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the identified Affiliate or other entity relevant to the Applicant’s CDFI Certification review is certified by the CDFI Fund as a CDE as of the date the CDFI Certification Application is submitted.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review, even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p> <p>Affiliates or other entities related to the one seeking to obtain or maintain the CDFI Certification are assessed as part of the primary entity under review’s compliance with the CDFI Certification Primary Mission requirements. If Affiliates or other entities have an active Community Development Entity (CDE) Certification with the CDFI Fund when the review of that other entity is being conducted and are presumed to meet all Primary Mission requirements in connection with the primary entity under review’s CDFI Certification, then the Primary Mission section of the CDFI Certification Application <b>does not</b> have to be completed for any such Affiliate/other related entity.</p>			
<b>Review the following information before completing this field:</b>			
<ul style="list-style-type: none"> <li>• Key Term – Affiliate</li> <li>• Key Term – Control, Controlled, or Controlling</li> <li>• CDFI Certification Primary Mission requirements</li> </ul>			
<b>Field</b>	<b>BI-A06</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Is the Affiliate’s sole line of business the administration of another federal financing program(s)?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the sole activity for the identified Affiliate or other entity relevant to the Applicant’s CDFI Certification review as of the date the CDFI Certification Application is submitted is the participation in other federal financing programs.</p>			

While the label/question for this field indicates that it only pertains to Affiliates, it is **completed for each** entity relevant to the Applicant’s CDFI Certification review, even if the relevant entity **does not** qualify as an Affiliate of the Applicant as defined by the CDFI Fund.

By sole line of business, the CDFI Fund means an entity’s only purpose is to administer or participate in a federal financing program(s) other than the CDFI Fund’s funding programs.

Applicants are required only to attest in BI-A06 whether an Affiliate's sole line of business is the administration of another federal financing program(s) (e.g., the SBA 7(A) loan program) and, if the answer is yes, then identify the program in BI-A06.1.

Affiliates or other entities related to the one seeking to obtain or maintain the CDFI Certification are assessed as part of the primary entity under review’s compliance with the CDFI Certification Primary Mission requirements. If Affiliates’ or other entities’ sole activity is the participation in other federal financing programs and are presumed to meet all Primary Mission requirements in connection with the primary entity under review’s CDFI Certification, then the Primary Mission section of the CDFI Certification Application does not have to be completed for any such Affiliate/other related entity.

**Review the following information before completing this field:**

- Key Term – Affiliate
- Key Term – Control, Controlled, or Controlling
- CDFI Certification Primary Mission requirements

Field	BI-A06.1	Field Type	Text
<b>Field Label/Question Text</b>	If the Affiliate’s/other related entity’s sole line of business is the administration of another federal financing program(s): Identify the other federal financing program(s).		
<b>Response</b>	Enter name(s).		
<b>Response Instruction(s)</b>			
<p>Affiliates whose sole activity is the participation in other federal financing programs, as evidenced in organizing documents, are presumed to meet the CDFI Certification primary mission requirements. Applicants are not required to include additional information on such Affiliates when completing the Primary Mission section of the Application. Confirmation of an Affiliate’s line of business is subject to review during CDFI Certification compliance checks (e.g., site visits, desk audits). An Affiliate that engages in other activities in addition to the administration of another federal financing program is not covered by this exemption.</p> <p>Enter the name(s) of the other federal financing program(s), the administration of which is the sole line of business for the identified Affiliate or other entity relevant to the Applicant’s CDFI Certification review.</p> <p>While the label/question for this field may indicate that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review for which the sole line of business is the administration of another federal financing program(s), even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• CDFI Certification Primary Mission requirements</li> </ul>			

Field	BI-A07	Field Type	Picklist
Field Label/Question Text	If the Applicant is a DIHC or an Affiliate of a DIHC: Identify the relationship between the Applicant and the Affiliate.		
Response	Select one: <ul style="list-style-type: none"> <li>• The Affiliate is a DIHC that Controls the Applicant.</li> <li>• The Affiliate directly engages in Financial Product or Financial Services activity, and it and the Applicant are under the mutual Control of a DIHC.</li> <li>• The Affiliate directly engages in Financial Product or Financial Services activity, and the Applicant is a DIHC that Controls the Affiliate.</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response that identifies the relationship between the DIHC Applicant or DIHC Affiliate Applicant and the identified Affiliate or other entity relevant to the Applicant’s CDFI Certification review.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is <b>completed for each entity</b> relevant to a DIHC Applicant’s or Affiliate of a DIHC Applicant’s CDFI Certification review, even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p> <p><u>Select the “The Affiliate is a DIHC that Controls the Applicant” response option if the identified entity relevant to the Applicant’s CDFI Certification review is a DIHC Affiliated with the Applicant, even if it does not Control the Applicant.</u></p> <p><u>Select the “The Affiliate directly engages in Financial Products or Financial Services activity, and it and the Applicant are under the mutual Control of a DIHC.” response option if:</u></p> <ul style="list-style-type: none"> <li>• The Applicant is a DIHC and the identified entity relevant to the Applicant’s CDFI Certification review is (1) not a DIHC, (2) directly engages in eligible Financial Products or eligible Financial Services activity, and (3) is under the mutual Control of another entity (i.e., a third-party[ies] Controls DIHC Applicant and identified relevant entity), even if that other Controlling entity is not a DIHC;</li> <li>• The Applicant is the Affiliate of a DIHC and the identified entity is (1) not a DIHC; (2) directly engages in eligible Financial Products or eligible Financial Services activity, and (3) is under the mutual Control of another entity (i.e., a third-party[ies] Controls Affiliate of a DIHC Applicant and the identified entity), even if that other Controlling entity is not a DIHC.</li> </ul> <p><u>Select the “The Affiliate directly engages in Financial Products and Financial Services activity, and the Applicant is a DIHC that Controls the Affiliate.” Response option if:</u></p> <ul style="list-style-type: none"> <li>• The Applicant is a DIHC and the identified entity relevant to the Applicant’s CDFI Certification review is not a DIHC, it directly engages in eligible Financial Products or eligible Financial Services activity, and it is either Controlled by or Controls (excludes Controlling entities that are tribal governments) the DIHC Applicant;</li> <li>• Is an Affiliate of a DIHC and the identified directly is not a DIHC, it directly engages in eligible Financial Products or eligible Financial Services activity, and it is either Controlled by or Controls (excludes Controlling entities that are tribal governments) a DIHC Affiliated with the Applicant.</li> </ul>			

<p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – Affiliate</li> <li>• Key Term – Control, Controlled, or Controlling</li> <li>• Key Term – eligible Financial Products activity/transaction</li> <li>• Key Term – eligible Financial Services activity/Financial Service</li> <li>• CDFI Certification collective review provision</li> </ul>			
<b>Field</b>	<b>BI-A08</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p><u>If the Applicant is a Subsidiary of an IDI:</u> Identify the relationship between the Applicant and the Affiliate.</p>		
<b>Response</b>	<p>Select one:</p> <ul style="list-style-type: none"> <li>• The Affiliate is an IDI that Controls the Applicant.</li> <li>• The Affiliate directly engages in Financial Product or Financial Services activity, and the Affiliate and the Applicant are under the mutual Control of an IDI.</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response that identifies the relationship between the IDI Subsidiary Applicant and identified Affiliate or other entity relevant to the Applicant’s CDFI Certification review.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is <b>completed for each entity</b> relevant to a Subsidiary of an IDI Applicant’s CDFI Certification review, even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p> <p>Select the <u>“The Affiliate directly engages in Financial Products or Financial Services activity, and the Affiliate and the Applicant are under the mutual Control of an IDI.”</u> response option if the identified entity relevant to the Applicant’s CDFI Certification review <u>directly engages in eligible Financial Products or eligible Financial Services activity and if it and the Subsidiary of an IDI Applicant are under the mutual Control of an IDI (i.e., any IDI Controls them both).</u></p>			
<p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – Affiliate</li> <li>• Key Term – Control, Controlled, or Controlling</li> <li>• Key Term – eligible Financial Products activity/transaction</li> <li>• Key Term – eligible Financial Services activity/Financial Service</li> </ul>			
<b>Field</b>	<b>BI-A09</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p><u>If the Applicant is <i>not</i> a DIHC, an Affiliate of a DIHC, or a Subsidiary of an IDI:</u> Identify the relationship between the Applicant and the Affiliate.</p>		
<b>Response</b>	<p>Select one:</p>		

	<ul style="list-style-type: none"> <li>• The Affiliate Controls the Applicant (do not include tribal governments).</li> <li>• The Affiliate is Controlled by the Applicant and directly engages in the provision of Financial Products or Financial Services.</li> <li>• The Affiliate and Applicant are mutually Controlled by another entity, and the Affiliate directly engages in the provision of Financial Products or Financial Services.</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response that identifies the relationship between an Applicant that is <b>NOT</b> a DIHC, an Affiliate of a DIHC, or a Subsidiary of an IDI to the identified Affiliate.</p> <p>By directly engaging in Financial Products or Financial Services activity, the CDFI Fund means directly engaging in eligible Financial Products or eligible Financial Services activity.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – Affiliate</li> <li>• Key Term – Control, Controlled, or Controlling</li> <li>• Key Term – eligible Financial Products activity/transaction</li> <li>• Key Term – eligible Financial Services activity/Financial Service</li> <li>• Collective Review provision</li> </ul>			
<b>Field</b>	<b>BI-A10</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	<p><u>If the Applicant seeks to use the CDFI Certification provision for Spin-offs to meet the Financing Entity and Target Market criteria:</u></p> <p>Identify the relationship between the Applicant and the original entity from which it received Spin-off Financial Product activity.</p>		
<b>Response</b>	<p>Select one:</p> <ul style="list-style-type: none"> <li>• The entity Controlled the Applicant when it transferred Financial Product activity to the Applicant.</li> <li>• The entity was Controlled by the Applicant when it transferred Financial Product activity to the Applicant.</li> <li>• The entity and Applicant were mutually Controlled by another entity when it transferred Financial Product activity to the Applicant.</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response(s) that identifies the relationship between the Applicant and the Affiliate whose information is being presented as it pertains to the Applicant’s use of the CDFI Certification Spin-off provision.</p> <p>Applicants that selected “Applicant seeks to use the CDFI Certification Provision for Spin-off entities,” in <b>BI11.1</b> must be able to identify at least one entity that qualifies as an Affiliate based on both the date the CDFI Certification Application is submitted and the date when the Financial Products activity portfolio transferred from the entity to the Applicant.</p>			

<p>The N/A response option will be chosen only if the Affiliate whose information is being presented is not the one from which the Applicant received a transferred portfolio of Financial Products activity or, it is, but the Applicant does not seek to use the relevant Affiliate to help it meet the Spin-off provision requirements.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• CDFI Certification provision for Spin-off entities</li> </ul>			
<b>Field</b>	<b>BI-A11</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	<p><u>If the Applicant relies on the Affiliate to provide Development Services and the Affiliate relationship was not identified in any of the other Affiliate relationship data fields:</u> Identify the relationship between the Applicant and the Affiliate.</p>		
<b>Response</b>	<p>Select one:</p> <ul style="list-style-type: none"> <li>• The entity Controlled the Applicant when it transferred Financial Product activity to the Applicant.</li> <li>• The entity was Controlled by the Applicant when it transferred Financial Product activity to the Applicant.</li> <li>• The entity and Applicant were mutually Controlled by another entity when it transferred Financial Product activity to the Applicant.</li> <li>• N/A – The Applicant does not rely on the Affiliate to provide Development Services</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response that identifies the relationship between the Applicant and the Affiliate providing Development Services.</p>			
<b>Field</b>	<b>BI-A12</b>	<b>Field Type</b>	<b>Date</b>
<b>Field Label/Question Text</b>	<p><u>If the Applicant seeks to use the CDFI Certification provision for BG Program participation solely to participate in the CDFI Fund’s BG Program and such Affiliate is a Certified CDFI that Controls the Applicant:</u> What is the earliest date that the Affiliate can demonstrate that it closed an arm’s-length, on-balance sheet Financial Product or completed a Financial Services transaction?</p>		
<b>Response</b>	<p>Enter date.</p>		
<b>Response Instruction(s)</b>			
<p>Enter the earliest date the Certified CDFI Affiliate that Controls the Applicant can demonstrate that it directly closed an eligible Financial Products transaction or directly delivered an eligible Financial Service.</p>			

<p>To demonstrate the date that an eligible Financial Products transaction was closed, the Affiliate must have the closing documents for that transaction.                  To demonstrate the date that an eligible Financial Service was delivered, the Affiliate must have documentation that confirms the transaction.</p>			
<b>Field</b>	<b>BI-A13</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p><u>If the Applicant is a DIHC that is relying on the activity of its Affiliate(s) to meet the Target Market requirements:</u>                  Is this Affiliate a depository institution that currently provides financial services?</p>		
<b>Response</b>	<p>Yes, No, or N/A-The Applicant is NOT a DIHC that is relying on the activity of its Affiliate(s) to meet the Target Market requirements.</p>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response that indicates whether the Affiliate is a depository institution relevant to the DIHC Applicant’s CDFI Certification collective review process that currently provides financial services.</p>			
<b>Field</b>	<b>BI-A14</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p><u>If the Applicant seeks to use the CDFI Certification provision for Spin-off entities and the Applicant received Spin-off Financial Product activity from this entity:</u>                  Is the Applicant currently offering at least one arm’s-length, on-balance sheet Financial Product that was spun off by the original entity?</p>		
<b>Response</b>	<p>Yes or No</p>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the Spin-off Applicant is currently offering at least one Financial Product(s) that meets all of the following conditions:</p> <ul style="list-style-type: none"> <li>• part a portfolio of Financial Products transactions transferred to the Applicant;</li> <li>• transferor is an Affiliate whose information is being presented on or before the submission of the Spin-off’s CDFI Certification Application;</li> <li>• financial product transaction by the relevant Affiliate was at arm’s-length;</li> <li>• relevant Affiliate was the financing entity of record in the associated transaction’s closing documents; and</li> <li>• Spin-off Applicant itself currently offers the Financial Products at arm’s-length and as a financing entity of record in associated transaction closing documents.</li> </ul>			

<p><b>If “No,”</b> the Applicant is not eligible to use the CDFI Certification provision for Spin-off entities unless it has another eligible Affiliate that will help it meet the Spin-off requirements related to continuing the eligible Financial Products activity of an eligible Spin-off Affiliate.</p>			
<b>Field</b>	<b>BI-A14.1</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	<p><b>If “Yes,”</b> Identify at least one Financial Product that was spun off to the Applicant by the original entity.</p>		
<b>Response</b>	<p>Enter name.</p>		
<b>Response Instruction(s)</b>			
<p>Enter the name of at least one Financial Products that meets all of the following conditions:</p> <ul style="list-style-type: none"> <li>• part a portfolio of Financial Products transactions transferred to the Spin-off Applicant;</li> <li>• transferor is an Affiliate whose information is being presented on or before the submission of the Spin-off’s CDFI Certification Application;</li> <li>• financial product transaction by the relevant Affiliate was at arm’s-length;</li> <li>• relevant Affiliate was the financing entity of record in the associated transaction’s closing documents; and</li> <li>• Spin-off Applicant itself currently offers the Financial Products at arm’s-length and as a financing entity of record in associated transaction closing documents.</li> </ul>			
<b>Field</b>	<b>BI-A14.2</b>	<b>Field Type</b>	Date
<b>Field Label/Question Text</b>	<p>Provide the earliest date the original entity can demonstrate it closed a Spin-off Financial Product currently offered by the Applicant.</p>		
<b>Response</b>	<p>Enter date.</p>		
<b>Response Instruction(s)</b>			
<p>Enter the name of at least one Financial Products that meets all of the following conditions:</p> <ul style="list-style-type: none"> <li>• part a portfolio of Financial Products transactions transferred to the Spin-off Applicant;</li> <li>• transferor is an Affiliate whose information is being presented on or before the submission of the Spin-off’s CDFI Certification Application;</li> <li>• financial product transaction by the relevant Affiliate was at arm’s-length;</li> <li>• relevant Affiliate was the financing entity of record in the associated transaction’s closing documents; and</li> <li>• Spin-off Applicant itself currently offers the Financial Products at arm’s-length and as a financing entity of record in associated transaction closing documents.</li> </ul>			

*If the Applicant has multiple Affiliates or other entities relevant to its CDFI Certification review that need to be assessed in connection with one or more of the CDFI Certification requirements, repeat the “Affiliate – Basic Information” data fields for each such entity.*

## 5.3. Financial Products and Services

### 5.3.1. Applicant – Financial Products Information

#### **Obtaining Determination to Include New Financing Product Type(s) or Financing Service Type(s) as Eligible Financial Product(s) or Eligible Financial Service(s)**

If an entity wants to include any financing product or service not currently recognized by the CDFI Fund as an eligible Financial Products or eligible Financial Service in order to count related activity as eligible Financial Products or eligible Financial Services activity for the purpose of meeting any of the CDFI Certification requirements, it must obtain prior approval from the CDFI Fund. Prior approval must be received before the CDFI Certification Application is submitted. Please see [“Obtaining Determination to Include New Financing Product Type\(s\) or Financing Service Type\(s\) as Eligible Financial Product\(s\) or Eligible Financial Service\(s\)-General”](#) in the “Obtaining CDFI Certification-Related Determinations on New Financial Products Type(s), New Financial Services Type(s), Amended Responsible Financing Practice(s), New Disregarded or Included Major Use(s) of Assets/Staff Time, New Targeted Population(s), and New/Amended CDFI Certification Market Assessment Methodology(ies)” section of this guidance for more information on the relevant approval process.

#### **Applicant – Basic Information – Financial Products Information - (BI-FP) Data Fields**

Field	BI-FP01	Field Type	Auto populated
Field Label/Question Text	Is the Applicant a DIHC that does not directly offer any arm’s-length, on-balance sheet Financial Products?		
Response	[Auto populated - Auto populated from BI10.2 Basic Information – Applicant Basic Information section of CDFI Certification Application]		
<b>Response Instruction(s)</b>			
Will auto-populate based on the response made to this question in the Basic Information – Applicant section of the CDFI Certification Application form. Verify that response is accurate and, if needed, make correction.			
Field	BI-FP02	Field Type	Auto populated
Field Label/Question Text	Is the Applicant seeking to use the CDFI Certification provision that allows on-balance sheet Financial Product activity that is not arm’s-length to meet the CDFI Certification requirements solely for the purposes of participating in the BG Program?		
Response	[Auto populated - Auto populated from BI10.1 Basic Information – Applicant Basic Information section of CDFI Certification Application]		

Response Instruction(s)			
<p>Will auto-populate based on the response made to this question in the Basic Information – Applicant section of the CDFI Certification Application form. Verify that response is accurate and, if needed, make correction.</p>			
Field	BI-FP03	Field Type	Picklist
Field Label/Question Text	Identify the Financial Product transaction types offered directly by the Applicant.		
Response	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• Loans</li> <li>• Lines of credit</li> <li>• Credit Cards</li> <li>• Equity Investments</li> <li>• Debt with Equity features</li> <li>• Loan guarantees</li> <li>• Loan purchases</li> <li>• For CDFI Intermediaries- deposits in Insured Credit Union CDFI(s), emerging Insured Credit Union CDFI(s) or State-Insured Credit Union CDFI(s).</li> </ul>		
Response Instruction(s)			
<p>Select the eligible Financial Products type(s) offered directly by the Applicant via which it engages in eligible Financial Products activity.</p> <p>While the label/question for this field indicates that the response should reflect the eligible Financial Products type(s) offered by the Applicant, it should indicate the eligible Financial Products type(s) offered directly by the Applicant via which it engages in eligible Financial Products activity.</p> <p>For CDFI Certification purposes, the terms emerging Insured Credit Union CDFI(s) or State-Insured Credit Union CDFI(s) mean an Insured Credit Union or State-Insured Credit Union that has applied for or has received CDFI Program Technical Assistance, not a Certified CDFI.</p> <p>CDFI Intermediaries are defined as an entity that has been approved by the CDFI Fund as a Certified CDFI and whose primary business activity is eligible Financial Products activity with Certified CDFI(s) or emerging CDFI(s).</p> <p>For CDFI Certification purposes, an emerging CDFI is an entity that has applied for or has received CDFI Program Technical Assistance but is not a Certified CDFI.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Products activity/transaction</li> </ul>			
Field	BI-FP04	Field Type	Picklist
Field Label/Question Text	<p><u>If “Other similar financing” was selected as a Financial Product transaction type:</u></p>		

	Has the “Other similar financing” been pre-approved as an eligible new Financial Product category by the CDFI Fund?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
If “Other similar financing” was selected as a Financial Products transaction type that was recently approved by the CDFI Fund but does not display as a category in the BI-FP03 picklist, select “Yes”. If “No,” the Applicant cannot include the financing as an eligible Financial Products.			
<b>Field</b>	<b>BI-FP04.1</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	If “Yes,” Provide the name of the new Financial Product category exactly as it appears in the approval letter from the CDFI Fund.		
<b>Response</b>	Enter name		
<b>Response Instruction(s)</b>			
Enter the name of the new Financial Products transaction type exactly as it appears in the approval letter from the CDFI Fund.			
<b>Field</b>	<b>BI-FP05</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	For each of the Financial Product types offered directly by the Applicant, select the available Financial Product purpose(s).		
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• Home Purchase</li> <li>• Home Improvement</li> <li>• Real Estate – Construction/ Permanent/ Acquisition w/o Rehabilitation–Commercial</li> <li>• Real Estate – Construction–Housing–Multi-Family</li> <li>• Real Estate – Construction–Housing–Single Family</li> <li>• Real Estate – Rehabilitation–Commercial</li> <li>• Real Estate – Rehabilitation–Housing–Multi-Family</li> <li>• Real Estate – Rehabilitation–Housing–Single Family</li> <li>• Consumer</li> <li>• Non-Real Estate Business</li> <li>• Non-Real Estate Microenterprise</li> <li>• Other (e.g., Intermediary support other Certified CDFI[s])</li> </ul>		

Response Instruction(s)			
<p>Select the appropriate response to identify the Financial Products purpose(s) for each eligible Financial Products type offered directly by the Applicant via which it engages in eligible Financial Products activity.</p> <p>While the label/question for this field indicates that the response should reflect the purpose(s) for the eligible Financial Products type(s) offered by the Applicant, it should indicate the purpose(s) for the eligible Financial Products type(s) offered directly by the Applicant via which it engages in eligible Financial Products activity.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Products activity/transaction</li> </ul>			
Field	BI-FP06	Field Type	Text
Field Label/Question Text	If “Other” was selected for Financial Product Purpose, describe the purpose.		
Response	Provide description		
Response Instruction(s)			
<p>If “Other” was selected in BI-FP05, describe the Financial Products purpose. The Applicant’s explanation must include its community development goals and objectives and how the entity plans to achieve them.</p>			
Field	BI-FP07	Field Type	Picklist
Field Label/Question Text	Are the selected Financial Product transaction types offered directly by the Applicant?		
Response	Yes or No		
Response Instruction(s)			
<p>Select the appropriate response.</p>			
Field	BI-FP08	Field Type	Picklist
Field Label/Question Text	Are the selected Financial Product transaction types on balance sheet for the Applicant?		
Response	Yes or No		

Response Instruction(s)			
<p>Select the appropriate response to indicate whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the Applicant as eligible Financial Products activity. While the label/question for this field indicates that the response should reflect whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the Applicant on-balance sheet (i.e., where the Applicant is named as a financing entity of record for a transaction in the associated transaction closing documents), it should indicate whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the Applicant as eligible Financial Products activity.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Products activity/transaction</li> </ul>			
Field	BI-FP09	Field Type	Picklist
Field Label/Question Text	Are the selected Financial Product transaction types offered by the Applicant at arm’s-length?		
Response	Yes or No		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the Applicant as eligible Financial Products activity. While the label/question for this field indicates that the response should reflect whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the Applicant on-balance sheet (i.e., where the Applicant is named as a financing entity of record for a transaction in the associated transaction closing documents), it should actually indicate whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the Applicant as eligible Financial Products activity.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Products activity/transaction</li> </ul>			
Field	BI-FP10	Field Type	Date
Field Label/Question Text	What is the earliest date that the Applicant can demonstrate that it closed an arm’s-length, on-balance sheet transaction with its Financial Product?		
Response	Enter date.		
Response Instruction(s)			
Enter the earliest date that the Applicant can demonstrate that it closed an eligible Financial Products transaction.			

While the label/question for this field indicates that the earliest date that the Applicant can demonstrate that it closed an eligible Financial Products transaction via an eligible Financial Products type that it currently offers should be entered, the response should provide the earliest date that the Applicant can demonstrate that it closed an eligible Financial Products transaction of any kind, including via an eligible Financial Products type that it no longer provides.

To demonstrate the date that an eligible Financial Products transaction was closed, the Applicant must have the closing documents for that transaction.

**Review the following information before completing this field:**

- Key Term – eligible Financial Products activity/transaction

Field	BI-FP11	Field Type	Picklist
Field Label/Question Text	Does the Applicant report all consumer Financial Product transactions to a major credit bureau?		
Response	Yes, No, or N/A (i.e., does not offer consumer loan products)		
Response Instruction(s)			
Select the appropriate response.			

### 5.3.2. Applicant – Financial Services Information

#### **Obtaining Determination to Include New Financing Product Type(s) or Financing Service Type(s) as Eligible Financial Product(s) or Eligible Financial Service(s)**

If an entity wants to include any financing product or service not currently recognized by the CDFI Fund as an eligible Financial Products or eligible Financial Service in order to count related activity as eligible Financial Products or eligible Financial Services activity for the purpose of meeting any of the CDFI Certification requirements, it must obtain prior approval from the CDFI Fund. Prior approval must be received before the CDFI Certification Application is submitted.

Please see [“Obtaining Determination to Include New Financing Product Type\(s\) or Financing Service Type\(s\) as Eligible Financial Product\(s\) or Eligible Financial Service\(s\)”](#) in the “Obtaining CDFI Certification-Related Determinations on New Financial Products Type(s), New Financial Services Type(s), Amended Responsible Financing Practice(s), New Disregarded or Included Major Use(s) of Assets/Staff Time, New Targeted Population(s), and New/Amended CDFI Certification Target Market Assessment Methodology(ies)” section of this guidance for more information on the relevant approval process.

#### **Applicant – Basic Information – Financial Services Information - (BI-FS) Data Fields**

Field	BI-FS01	Field Type	Picklist
Field Label/Question Text	Does the Applicant offer financial services?		

<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to identify whether the Applicant directly offers any eligible Financial Services types via which it engages in eligible Financial Services activity.</p> <p>While the label/question for this field indicates that the response should reflect whether the Applicant directly offers any eligible Financial Services types, it should actually indicate whether the Applicant directly offers any eligible Financial Services types via which it engages in eligible Financial Services activity.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – Eligible Financial Services activity</li> </ul>			
<b>Field</b>	<b>BI-FS02</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	If the Applicant is a DIHC, does it directly offer any financial services?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to identify whether the Applicant directly offers any eligible Financial Services types via which it engages in eligible Financial Services activity.</p> <p>While the label/question for this field indicates that the response should reflect whether the Applicant directly offers any eligible Financial Services types, it should indicate whether the Applicant directly offers any eligible Financial Services types via which it engages in Financial Services activity.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <p>Key Term – eligible Financial Services activity</p>			
<b>Field</b>	<b>BI-FS03</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Identify each of the Financial Services categories offered directly by the Applicant.		
<b>Response</b>	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• Checking accounts</li> <li>• Savings accounts</li> <li>• Certificates of deposit (CD[s])</li> <li>• Money market accounts</li> <li>• Check cashing</li> <li>• Money orders</li> <li>• Certified checks</li> <li>• Automated teller machines</li> <li>• Safe deposit box services</li> </ul>		

Response Instruction(s)			
<p>Select the appropriate response(s) to identify each eligible Financial Services type offered directly by the Applicant via which it engages in eligible Financial Services activity.</p> <p>While the label/question for this field indicates that the response should reflect the eligible Financial Services type(s) offered by the Applicant directly, it should indicate the eligible Financial Services type(s) offered directly by the Applicant via which it engages in eligible Financial Services activity.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Services activity</li> </ul>			
Field	BI-FS04	Field Type	Date
Field Label/Question Text	Provide the earliest date a financial services transaction was completed.		
Response	Enter date.		
Response Instruction(s)			
<p>Enter the earliest date an eligible Financial Services transaction was directly delivered by the Applicant.</p> <p>The Financial Services transaction must have been delivered directly by the Applicant in the form of eligible Financial Services activity.</p> <p>The Financial Services transaction delivered directly by the Applicant in the form of eligible Financial Services activity can be one delivered via an eligible Financial Services type that is no longer offered by the Applicant.</p> <p>To demonstrate the date that an eligible Financial Service was delivered, the Applicant must have documentation that confirms the transaction.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Services activity</li> </ul>			

### 5.3.3. Affiliates – Financial Products Information

The Applicant must enter Financial Products information for each Affiliate or other entity relevant to review in connection with any of the CDFI Certification requirements.

#### **Obtaining Determination to Include New Financing Product Type(s) or Financing Service Type(s) as Eligible Financial Product(s) or Eligible Financial Service(s)**

If an entity wants to include any financing product or service not currently recognized by the CDFI Fund as an eligible Financial Products or eligible Financial Service in order to count related activity as eligible Financial Products or eligible Financial Services activity for the purpose of meeting any of the CDFI Certification requirements, it must obtain prior approval from the CDFI Fund. Prior approval must be received before the CDFI Certification Application is submitted. Please see "[Obtaining Determination to Include New Financing Product Type\(s\) or Financing Service Type\(s\) as Eligible Financial Product\(s\) or Eligible Financial Service\(s\)](#)" in the "Obtaining CDFI Certification-Related Determinations on New

Financial Products Type(s), New Financial Services Type(s), Amended Responsible Financing Practice(s), New Disregarded or Included Major Use(s) of Assets/Staff Time, New Targeted Population(s), and New/Amended CDFI Certification Target Market Assessment Methodology(ies)” section of this guidance for more information on the relevant approval process.

**Affiliates – Basic Information – Financial Products Information - (BI-AFP) Data Fields**

Field	BI-AFP01	Field Type	Picklist
<b>Field Label/Question Text</b>	Identify the Financial Product transaction types offered directly by the Affiliate.		
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• Loans</li> <li>• Lines of credit</li> <li>• Credit Cards</li> <li>• Equity Investments</li> <li>• Debt with Equity features</li> <li>• Loan guarantees</li> <li>• Loan purchases</li> <li>• Loans purchased from Certified CDFI(s)</li> <li>• Loans directed to the Affiliate’s proposed collective review market</li> <li>• Target Market purchased loans from entities without CDFI Certification</li> <li>• For CDFI Intermediaries – deposits in Insured Credit Union CDFI(s), emerging Insured Credit Union CDFIs or State-Insured Credit Union CDFI(s)</li> <li>• Other similar financing (pre-approved by the CDFI Fund)</li> <li>• N/A (Does not engage in eligible Financial Product activity)</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the eligible Financial Products type(s) offered directly by the relevant Affiliate/related entity via which it engages in eligible Financial Products activity.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review, even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p> <p>While the label/question for this field indicates that the response should reflect the eligible Financial Products type(s) offered by the relevant Affiliate/related entity, it should indicate the eligible Financial Products type(s) offered directly by the relevant Affiliate/related entity via which it engages in eligible Financial Products activity.</p> <p>For CDFI Certification purposes, the terms emerging Insured Credit Union CDFI(s) or State-Insured Credit Union CDFI(s) mean an Insured Credit Union or State-Insured Credit Union that has applied for or has received CDFI Program Technical Assistance but is not a Certified CDFI.</p>			

<p>CDFI Intermediaries are defined as an entity that has been approved by the CDFI Fund as a Certified CDFI and whose primary business activity is the provision of eligible Financial Products activity with Certified CDFI(s) or emerging CDFI(s).</p> <p>For CDFI Certification purposes, an emerging CDFI is an entity that has applied for or has received CDFI Program Technical Assistance, but is not a Certified CDFI.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Products activity/transaction</li> </ul>			
<b>Field</b>	<b>BI-AFP02</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p>If <b>“Other similar financing”</b> was selected as a Financial Product transaction type:                  Has the <b>“Other similar financing”</b> been pre-approved as an eligible new Financial Product category by the CDFI Fund?</p>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate if any <b>“Other similar financing”</b> was recently approved by the CDFI Fund but does not display as a category in the BI-AFP01 picklist.</p> <p>If <b>“No,”</b> the Affiliate cannot include the financing as an eligible Financial Products type via which it engages in eligible Financial Products activity.</p>			
<b>Field</b>	<b>BI-AFP02.1</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	<p>If <b>“Yes,”</b> Provide the name of the new Financial Product category exactly as it appears in the approval letter from the CDFI Fund.</p>		
<b>Response</b>	Enter name.		
<b>Response Instruction(s)</b>			
Enter the name of the new eligible Financial Products type(s) exactly as it appears in the approval letter from the CDFI Fund.			
<b>Field</b>	<b>BI-AFP03</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p>For each of the Financial Product types offered directly by the Affiliate, select the available Financial Product purpose(s).</p>		
<b>Response</b>	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• Home Purchase</li> <li>• Home Improvement</li> </ul>		

	<ul style="list-style-type: none"> <li>• Real Estate – Construction/ Permanent/Acquisition w/o Rehabilitation–Commercial</li> <li>• Real Estate – Construction–Housing–Multi-Family</li> <li>• Real Estate – Construction–Housing–Single Family</li> <li>• Real Estate – Rehabilitation–Commercial</li> <li>• Real Estate – Rehabilitation–Housing–Multi-Family</li> <li>• Real Estate – Rehabilitation–Housing–Single-Family</li> <li>• Consumer</li> <li>• Non-Real Estate Business</li> <li>• Non-Real Estate Microenterprise</li> <li>• Other (e.g., Intermediary support other Certified CDFI[s])</li> <li>• N/A (does not engage in eligible Financial Product activity)</li> </ul>
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**Response Instruction(s)**

Select the appropriate response to identify the Financial Products purpose(s) for each eligible Financial Products type offered directly by the relevant Affiliate/related entity via which it engages in eligible Financial Products activity.

While the label/question for this field indicates that it only pertains to Affiliates, it is to be completed for each entity relevant to the Applicant’s CDFI Certification review, even if the relevant entity does not qualify as an Affiliate of the Applicant, as defined by the CDFI Fund.

While the label/question for this field indicates that the response should reflect the purpose(s) for the eligible Financial Products type(s) offered directly by the relevant Affiliate/related entity, it should actually indicate the purpose(s) for the eligible Financial Products type(s) offered directly by the relevant Affiliate/related entity via which it engages in eligible Financial Products activity.

**Review the following information before completing this field:**

- Key Term – eligible Financial Products activity/transaction

<b>Field</b>	<b>BI-AFP04</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	If “Other” was selected for Financial Product Purpose, describe the purpose.		
<b>Response</b>	Provide description.		

**Response Instruction(s)**

If “Other” was selected in BI-AFP03, describe the Financial Products purpose. This selection should match one of the options shown in “Purpose” data point within the Transaction Level Report.

<b>Field</b>	<b>BI-AFP05</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Are the selected Financial Product transaction types offered directly by the Affiliate?		
<b>Response</b>	Yes, No, or N/A (does not engage in eligible Financial Product activity)		

Response Instruction(s)			
<p>Select the appropriate response.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review, even if the relevant entity does not qualify as an Affiliate of the Applicant, as defined by the CDFI Fund.</p>			
Field	BI-AFP06	Field Type	Picklist
Field Label/Question Text	Are the selected Financial Product transaction types on-balance sheet for the Affiliate?		
Response	Yes, No, or N/A (does not engage in eligible Financial Product activity)		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the relevant Affiliate/related entity as eligible Financial Products activity.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review even if the relevant entity does not qualify as an Affiliate of the Applicant, as defined by the CDFI Fund.</p> <p>While the label/question for this field indicates that the response should reflect whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the relevant Affiliate/related entity on-balance sheet (i.e., where the relevant Affiliate/related entity is named as a financing entity of record for a transaction in the associated transaction closing documents), it should indicate whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the relevant Affiliate/related entity as eligible Financial Products activity.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Products activity/transaction</li> </ul>			
Field	BI-AFP07	Field Type	Picklist
Field Label/Question Text	Are the selected Financial Product transaction types offered by the Affiliate at arm’s-length?		
Response	Yes, No, or N/A (does not engage in eligible Financial Product activity)		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the relevant Affiliate/related entity as eligible Financial Products activity.</p>			

While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.

While the label/question for this field indicates that the response should reflect whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the relevant Affiliate/related entity at arm’s-length (i.e., closed with non-Affiliated third party individuals or entities), it should actually indicate whether transactions for the selected eligible Financial Products type(s) are periodically closed directly by the relevant Affiliate/related entity as eligible Financial Products activity.

If “No,” each eligible Financial Products type(s) for which transactions are not periodically closed directly by the Affiliate as eligible Financial Products activity must be unselected.

**Review the following information before completing this field:**

- Key Term – eligible Financial Products activity/transaction

<b>Field</b>	<b>BI-AFP08</b>	<b>Field Type</b>	<b>Date</b>
<b>Field Label/Question Text</b>	What is the earliest date that the Affiliate can demonstrate that it closed an arm’s-length, on-balance sheet transaction with its Financial Product?		
<b>Response</b>	Enter date.		

**Response Instruction(s)**

Enter the earliest date that the relevant Affiliate/related entity can demonstrate that it directly closed an eligible arm’s-length, on-balance sheet transaction with its Financial Products transaction.

While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.

While the label/question for this field indicates that the earliest date that the relevant Affiliate/related entity can demonstrate that it directly closed an eligible Financial Products transaction via an eligible Financial Products type that it currently offers should be entered, the response should actually provide the earliest date that the relevant Affiliate/related entity can demonstrate that it directly closed an eligible Financial Products transaction of any kind, including via an eligible Financial Products type that it no longer provides.

To demonstrate the date that an eligible Financial Products transaction was closed, the relevant Affiliate/related entity must have the closing documents for that transaction.

If the Affiliate does not engage in any eligible Financial Products activity, please leave this field blank.

**Review the following information before completing this field:**

- Key Term – eligible Financial Products activity/transaction

<b>Field</b>	<b>BI-AFP09</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Does the Affiliate report all consumer Financial Product transactions to a major credit bureau?		

<b>Response</b>	Yes, No, or N/A (i.e., does not offer consumer loan products)
<b>Response Instruction(s)</b>	
<p>Select the appropriate response.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p>	

### 5.3.4. Affiliates – Financial Services Information –Data Fields

The Applicant must enter Financial Services information for each Affiliate or other entity relevant to review in connection with any of the CDFI Certification requirements.

#### **Obtaining Determination to Include New Financing Product Type(s) or Financing Service Type(s) as Eligible Financial Product(s) or Eligible Financial Service(s)**

If an entity wants to include any financing product or service not currently recognized by the CDFI Fund as an eligible Financial Products or eligible Financial Service in order to count related activity as eligible Financial Products or eligible Financial Services activity for the purpose of meeting any of the CDFI Certification requirements, it must obtain prior approval from the CDFI Fund. Prior approval must be received before the CDFI Certification Application is submitted. Please see [“Obtaining Determination to Include New Financing Product Type\(s\) or Financing Service Type\(s\) as Eligible Financial Product\(s\) or Eligible Financial Service\(s\)”](#) in the “Obtaining CDFI Certification-Related Determinations on New Financial Products Type(s), New financial services Type(s), Amended Responsible Financing Practice(s),

New Disregarded or Included Major Use(s) of Assets/Staff Time, New Targeted Population(s), and New/Amended CDFI Certification Target Market Assessment Methodology(ies)” section of this guidance for more information on the relevant approval process.

#### **Affiliates – Basic Information – Financial Services Information - (BI-AFS) Data Fields**

<b>Field</b>	<b>BI-AFS01</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Does the Affiliate offer Financial Services?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to identify whether the relevant Affiliate/related entity directly offers any eligible Financial Services types via which it engages in eligible Financial Services activity.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p>			

<p>While the label/question for this field indicates that the response should reflect whether the relevant Affiliate/related entity directly offers any eligible Financial Services types, it should actually indicate whether the relevant Affiliate/related entity directly offers any eligible Financial Services types via which it engages in eligible Financial Services activity.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Services activity</li> </ul>			
<b>Field</b>	<b>BI-AFS02</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	If the Affiliate is a DIHC, does it directly offer any Financial Services?		
<b>Response</b>	Yes, No, or N/A – Affiliate is not a DIHC		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to identify whether the relevant Affiliate/related entity is a DIHC that directly offers any eligible Financial Services types via which it engages in eligible Financial Services activity.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p> <p>While the label/question for this field indicates that the response should reflect whether the relevant Affiliate/related entity offers any eligible Financial Services types, it should actually indicate whether the relevant Affiliate/related entity offers any eligible Financial Services types via which it engages in eligible Financial Services activity.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Services activity</li> </ul>			
<i>This field may sometimes appear after BI-AFS04.</i>			
<b>Field</b>	<b>BI-AFS03</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Identify each of the financial services categories offered directly by the Affiliate.		
<b>Response</b>	Yes, No or N/A – not a DIHC		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response(s) to identify the eligible Financial Services type(s) offered directly by the relevant Affiliate/related entity via which it engages in eligible Financial Services activity.</p> <p>While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.</p>			

While the label/question for this field indicates that it only pertains to Affiliates, it is completed for each entity relevant to the Applicant’s CDFI Certification review even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.

While the label/question for this field indicates that the response should reflect the eligible Financial Services type(s) offered by the relevant Affiliate/related entity, it should actually indicate the eligible Financial Services type(s) via which the relevant Affiliate/related entity engages in eligible Financial Services activity.

**Review the following information before completing this field:**

- Key Term – eligible Financial Services activity

Field	BI-AFS04	Field Type	Date
Field Label/Question Text	Provide the earliest date a Financial Services transaction was completed.		
Response	Enter date.		
<b>Response Instruction(s)</b>			
<p>Enter the earliest date an eligible Financial Services transaction was directly delivered by the relevant Affiliate/related entity.</p> <p>The Financial Services transaction must have been delivered directly by the relevant Affiliate/related entity in the form of eligible Financial Services activity.</p> <p>The Financial Services transaction delivered directly by the relevant Affiliate/related entity in the form of eligible Financial Services activity can be one delivered via an eligible Financial Services type that is no longer offered by that entity.</p> <p>To demonstrate the date that an eligible Financial Service was delivered, the relevant Affiliate/related entity must have documentation that confirms the transaction.</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – eligible Financial Services activity</li> </ul>			

## 5.4. Legal Entity

### 5.4.1. Legal Entity Requirements

An entity seeking to obtain or maintain CDFI Certification must be duly organized in accordance with the standards of an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry. For banks/thrifts or credit unions, a charter issued by an appropriate federal or State agency is required. The entity must also be the primary holder of an Employer Identification Number (EIN) provided by the U.S. Internal Revenue Service.

Organizing documents, including any amendments, with evidence generated by the appropriate government or tribal government agency that they were at filed with such an agency must be maintained and available upon request from the CDFI Fund.

To demonstrate its legal entity status for CDFI Certification Application purposes, when the CDFI Certification Application is submitted, an entity must have a Unique Entity ID (UEI) generated by the federal government's System for Award Management (SAM) and an active and valid SAM registration at SAM.gov as an entity that directly bids on or manages federal contracts or directly applies for or manages federal financial assistance as the prime responsible entity.



#### **[CLARIFYING UPDATE 07/05/2025]**

An organization applying for CDFI Certification must fully register with SAM.gov. Simply obtaining the UEI without fully registering with SAM.gov is not sufficient. Additionally, once certified, a CDFI must continue to demonstrate that it maintains an active SAM.gov account. A lapse in the SAM.gov account may result in loss of CDFI Certification, as maintaining an active SAM.gov account is required to meet the Legal Entity requirement for CDFI Certification.

### **Completing the CDFI Certification Application Legal Entity Section**


Certain information in the Legal Entity section of the CDFI Certification Application will be auto populated based on data from the Applicant's AMIS account. **To ensure that accurate information is auto populated into the CDFI Certification Application form, data in the Applicant's AMIS account must be up to date.**

To complete the Legal Entity section of the CDFI Certification Application, an Applicant will:

- Enter a UEI obtained via SAM.gov in the Details section of the Organization page in its AMIS account.
- Maintain an active and valid SAM registration at [SAM.gov](https://sam.gov) as an entity that directly bids on/or manages federal contracts or directly applies for or manages federal financial assistance as the prime responsible entity.
- Review and, if needed, provide, or correct any information intended to be auto populated into the CDFI Certification Application Legal Entity section fields.

- If information in the CDFI Certification Application that is supposed to be auto populated from the Applicant’s or another entity’s AMIS account is missing or inaccurate, that information must be provided or updated in the relevant AMIS account and correctly auto populated in the CDFI Certification Application prior to its submission. To update AMIS account data that can be modified directly by the account holder, follow the instructions in the AMIS guidance. For assistance with AMIS account data that can only be updated by the CDFI Fund, an AMIS Service Request should be submitted.
- Complete the non-auto populated Legal Entity section field(s).
- Attach copies of all required documentation.

<b>NOTE</b>	CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.
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Applicants are advised to make sure they have an active and valid SAM account before beginning any aspect of the CDFI Certification Application. The SAM website is: [SAM.gov](https://sam.gov).

Questions about SAM registration or the UEI should be directed to SAM.gov via contact information identified at the SAM.gov website. The CDFI Fund does not manage SAM.gov and is unable to respond to any questions related to that system.

### 5.4.2. Legal Entity

#### **Applicant – Legal Entity – (LE) Data Fields**

Field	LE01	Field Type	Auto populated
Field Label/Question Text	Applicant EIN		
Response	Auto populated from the Applicant’s AMIS account		
<b>Response Instruction(s)</b>			
Reflects the EIN on the AMIS Organization page (Details tab). <ul style="list-style-type: none"> <li>• The auto populated response must be the Applicant’s EIN exactly as it shows in EIN documentation generated by the Internal Revenue Service and that was used for its SAM registration at SAM.gov or the CDFI Certification Application will be rejected.</li> <li>• The Applicant must be the <a href="#">primary holder of the EIN</a>.</li> <li>• If the EIN in this field is not the Applicant’s exact EIN, please contact the CDFI Fund via an AMIS Service Request to have it corrected before the Application is submitted.</li> </ul>			

<b>Field</b>	<b>LE02</b>	<b>Field Type</b>	Auto populated.
<b>Field Label/Question Text</b>	Applicant – Unique Entity ID.		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account.]		
<b>Response Instruction(s)</b>			
<p>The Unique Entity ID (UEI) auto-populated from the Applicant’s AMIS account must match the UEI that shows for the Applicant in SAM.gov or the CDFI Certification Application will be declined.</p> <p>An organization applying for CDFI Certification must fully register with SAM.gov. Simply obtaining the UEI without fully registering with SAM.gov is not sufficient. Additionally, once certified, a CDFI must continue to demonstrate that it maintains an active SAM.gov account. A lapse in the SAM.gov account may result in loss of CDFI Certification, as maintaining an active SAM.gov account is required to meet the Legal Entity requirement for CDFI Certification.</p>			
<b>Field</b>	<b>LE03</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Date of Incorporation/ Organization/Establishment		
<b>Response</b>	[Auto populated from the Applicant’s AMIS account.]		
<b>Response Instruction(s)</b>			
Reflects the Date of Incorporation/Organization/Establishment on the AMIS Organization page (Details tab).			
<b>Field</b>	<b>LE04</b>	<b>Field Type</b>	Auto populated.
<b>Field Label/Question Text</b>	Applicant Institution Type		
<b>Response</b>	Auto populated from the Applicant’s AMIS account.		
<b>Response Instruction(s)</b>			
<p>If any other entity type is entered into the “Financial Institution Type” field on an Applicant’s AMIS Organization Detail page, select the financial institution type that best describes the organization. Applicants that self-identify as a loan fund, bank or thrift, credit union, bank holding company, or venture capital fund are eligible for CDFI Certification.</p>			
<b>Field</b>	<b>LE11</b>	<b>Field Type</b>	Attachment
<b>Field Label/Question Text</b>	<p>If the Applicant seeks to use the CDFI Certification provision solely for <u>participation in the BG Program</u>:</p> <p>Attach the operating agreement between the Applicant and a Controlling Certified CDFI that includes management and ownership provisions.</p>		

<b>Response</b>	Attach operating agreement
<b>Response Instruction(s)</b>	
<p>Attach proof of the Applicant’s status as a Subsidiary of a Controlling Certified CDFI(s) or, if the Applicant will use eligible activity with a Controlling Certified CDFI(s) to meet any CDFI Certification requirement, attach a copy of the Applicant’s current binding operating agreement(s) with a Certified CDFI(s) with clear acceptable evidence (in one of the ways accepted by the CDFI Fund) of its approval by the Applicant’s governing leadership and its approval date.</p> <p>If an Applicant, relying on a provision allowed for entities seeking to obtain or maintain CDFI Certification for the sole purposes of participating in the CDFI Fund’s BG Program, will not use activity with a Controlling Certified CDFI to meet any CDFI Certification requirement, the only proof needed of the Control relationship with an entity identified as a Controlling Certified CDFI is a governing leadership-approved document evidencing that relationship. Examples of documents that evidence a Control relationship between entities include a stock summary report showing that the Controlling entity owns at least 25% of the other entity’s voting shares; a memorandum of understanding between the two entities that addresses the Control relationship; or a copy of Subsidiary’s governance document stating that the Controlling entity appoints a majority of the Subsidiary’s governing board or that indicates other forms of Control; etc. The document must evidence governing leadership approval in a way accepted by the CDFI Fund for CDFI Certification purposes (see <a href="#">Evidence that a Document is Governing Leadership-Approved</a> in the CDFI Certification – Documentation Requirements section of this guidance manual).</p> <p>If an Applicant, relying on a provision allowed for entities seeking to obtain or maintain CDFI Certification for the sole purposes of participating in the CDFI Fund’s BG Program, will use eligible activity with a Controlling Certified CDFI to meet any CDFI Certification requirement, the proof of the relationship with a Controlling Certified CDFI must, per the CDFI Program interim regulations, take the form of an operating agreement that includes management and ownership provisions and that are in a form and substance acceptable to the CDFI Fund (12 CFR 1805.201(b)(2)(C)(iii)).</p> <p>While the field label/question for this field indicates that an operating agreement must be provided, if the Applicant that will not use activity with a Controlling Certified CDFI to meet any CDFI Certification requirement, then an operating agreement is not specifically required.</p> <p>If the documentation provided does not include evidence that the relevant document is binding via clear acceptable evidence (in one of the ways allowed by the CDFI Fund) of its approval by the Applicant’s governing leadership and its approval date, the document will not be considered valid, which may result in the decline of the CDFI Certification Application. For information on evidence of governing leadership approval that is accepted for CDFI Certification purposes, see “<a href="#">Evidence that a Document is Governing Leadership-Approved</a>” in the CDFI Certification – Documentation Requirements section of this guidance manual.</p> <p>The Applicant’s entity name must show clearly in the relevant document(s) and must match its current entity name as it appears in its AMIS account or documentation filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry, linking the entity name in the governance document to the current entity name in AMIS must be provided.</p> <p>The effective date of any operating agreement provided must be as of or prior to the submission date of the CDFI Certification Application.</p>	

If an Applicant is using the CDFI Certification provision for entities seeking to obtain/maintain CDFI Certification solely for participation in the CDFI Fund’s BG Program will rely on multiple Controlling Certified CDFIs to meet the CDFI Certification requirements, the current operating agreement with each such entity must be provided.

**NOTE:** CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.

Any operating agreement provided will be evaluated to ensure it is in a form and substance acceptable to the CDFI Fund per 12 CFR 1805.201(b)(2)(C)(ii-iii).

### 5.4.3. Legal Entity (Regulated)

#### Applicant – Legal Entity Regulated – (LE) Data Fields

<b>Field</b>	<b>LE05</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Applicant Federal Regulator		
<b>Response</b>	Auto populated from the Applicant’s AMIS account		
<b>Response Instruction(s)</b>			
Federally regulated banks/thrifts, bank/thrift holding companies, and credit unions must provide the federal regulator.			
<b>Field</b>	<b>LE06</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Applicant Charter Number		
<b>Response</b>	Auto populated from the Applicant’s AMIS account.		
<b>Response Instruction(s)</b>			
Federally chartered banks/thrifts, bank/thrift holding companies, and credit unions must provide the charter number.			
<b>Field</b>	<b>LE07</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Applicant FDIC Insurance Certificate Number		
<b>Response</b>	Auto populated from the Applicant’s AMIS account		

Response Instruction(s)			
Federally insured banks/thrifts, bank/thrift holding companies, and credit unions must provide the FDIC insurance certificate number.			
Field	LE08	Field Type	Auto populated
Field Label/Question Text	Applicant RSSID Number		
Response	Auto populated from the Applicant’s AMIS account		
Response Instruction(s)			
Applicants assigned an RSSID number by the Federal Reserve must provide the RSSID number			
Field	LE09	Field Type	Picklist
Field Label/Question Text	Applicant State, Other Regulator, or Federal Regulator		
Response	Auto populated from the Applicant’s AMIS account		
Response Instruction(s)			
Banks/thrifts, bank/thrift holding companies, and credit unions that are not federally regulated must identify whether they are regulated by a State or other regulator			
Field	LE10	Field Type	Picklist
Field Label/Question Text	If the Applicant is a depository institution, identify the Applicant’s insurer		
Response	Select all that apply: <ul style="list-style-type: none"> <li>• FDIC</li> <li>• NCUA</li> <li>• State Regulator</li> <li>• Other</li> <li>• None</li> </ul>		
Response Instruction(s)			
Depository Institutions must select the appropriate insurer. Depository Institutions that are not federally or State insured must complete the Financing Entity section. Applicants other than those insured by the FDIC, NCUA, or a State Regulator must complete the Financing Entity section of the Application.			

## 5.5. Primary Mission

### **CDFI Certification Primary Mission Requirements**

To meet the CDFI Certification requirements, an entity must have the promotion of community development as its primary mission.

In determining whether an entity's primary mission is the promotion of community development, the CDFI Fund will consider whether its activities (and, as applicable, those of certain Affiliates or of other entities relevant to the CDFI Certification review) are, as per the CDFI Program interim regulations (12 CFR 1805.201(b)(1)), *purposefully* directed toward improving the social or economic conditions of underserved people (includes Low-Income persons or, as approved by the CDFI Fund, other populations that lack adequate access to capital or financial services) or residents of economically distressed communities.

Further, if an entity seeking to obtain or maintain CDFI Certification has an Affiliate(s) that either Controls it or that engages in eligible Financial Products or eligible Financial Service activity, that Affiliate(s) will also be taken into consideration as part of the Primary Mission review, as will, if the entity seeking to obtain or maintain CDFI Certification is subject to the CDFI Certification collective review, each entity relevant to the collective review process.

Except as allowed in connection with certain CDFI Certification provisions (e.g., DIHC[s] that do not engage in their own direct Financial Products activity, entities seeking CDFI Certification solely for participation in the CDFI Fund's Bond Guarantee Program or, in connection with the submission of the CDFI Certification Application only, Spin-off entities), **an entity seeking to obtain or maintain CDFI Certification must demonstrate that:**


- Its current governing leadership-approved primary mission is the promotion of community development;
- It has had the promotion of community development as its governing leadership-approved primary mission for at least the most recent six full calendar months;
- It has a governing leadership-approved community development strategy; and
- If it engages in eligible Financial Products or eligible Financial Service activity, that activity meets the CDFI Certification Primary Mission-related responsible financing practices standards.

Examples of promoting community development include providing responsible Financial Products and Financial Service to low-income individuals, Other Targeted Populations recognized for CDFI Certification purposes, or residents of or businesses located in economically distressed communities; promoting affordable housing, the availability and viability of Community Facilities (i.e., facilities where health care, childcare, educational, cultural, or social services are provided), or economic development, particularly in distressed communities; or supporting the provision of community services such as child care, education, health care, social services, or workforce development.

If an entity seeking to obtain or maintain CDFI Certification has an Affiliate(s) or is subject to the CDFI Certification Collective Review, the following Primary Mission-related requirements also apply:

- Primary Mission for entities with an Affiliate(s):


- Any entity seeking to obtain or maintain CDFI Certification that has an Affiliate(s) must not only demonstrate its own compliance with the CDFI Certification Primary Mission requirements as the primary entity under review for CDFI Certification purposes, but must also demonstrate that each Affiliate, other than a tribal government, that Controls it or that engages in eligible Financial Products or eligible Financial Service activity meets the following Primary Mission-related requirements:
  - It currently has a governing leadership-approved mission that supports or is consistent with the primary entity under review’s primary mission of promoting community development;
  - Its activities support or are consistent with the primary entity under review’s primary mission of promoting community development mission; ***and***
  - If it engages in eligible Financial Products or eligible Financial Service activity, that activity meets the CDFI Certification primary mission-related responsible financing practices standards.



**[CLARIFYING UPDATE 07/05/2025]**

Multiple Affiliates that are separately Certified CDFIs or Community Development Entities (CDEs) when the CDFI Certification review of the other Affiliate is being conducted, as well as Affiliates whose sole activity is the participation in other federal financing programs are presumed to meet the CDFI Certification primary mission requirements.

<b>NOTE</b>	<p>Confirmation of an entity’s line of business, as evidenced by its organizing documents, is subject to review during CDFI Certification compliance checks. Affiliates that engage in additional activities other than the administration of another federal financing program is not covered by this exemption.</p> <p>If a covered Affiliate is not a Certified CDFI or Certified CDE, it is not required to have a mission of promoting community development in place for the purposes of CDFI Certification. However, a covered Affiliate must demonstrate that it has a mission currently in place that supports and/or is consistent with that of the Applicant’s.</p>
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***Collective Review***

Primary Mission for entities subject to the CDFI Certification Collective Review (DIHC[s], Affiliates of DIHC[s], and Subsidiaries of IDI[s]):

Any entity subject to the CDFI Certification Collective Review (i.e., DIHC, Affiliate of a DIHC[s], or Subsidiary of an IDI[s], including any such entity operated by or Affiliated with a tribal government) must not only demonstrate its own compliance with the CDFI Certification Primary Mission requirements as the primary entity under review for CDFI Certification purposes, but must also demonstrate that each entity relevant to its CDFI Certification collective review process

(entities relevant to the CDFI Certification collective review process are described in the “Requirements for DIHC[s], Affiliates of DIHC[s], and Subsidiaries of IDI[s]”) meets the following standard Primary Mission and other applicable Primary Mission-related requirements:

The promotion of community development is its current governing leadership-approved primary mission;

If it engages in eligible Financial Products or eligible Financial Service activity and the entity seeking to obtain or maintain CDFI Certification is a DIHC that does not engage in its own direct eligible Financial Products activity, it has had the promotion of community development as its governing leadership-approved primary mission for at least the most recent six full calendar months;

Its activities support or are consistent with the primary entity under review’s primary mission of promoting community development; and

If it engages in eligible Financial Products or eligible Financial Service activity, that activity meets the CDFI Certification primary mission-related responsible financing practices standards.

Each Affiliate of an entity subject to the CDFI Certification collective review that is not relevant to the CDFI Certification collective review process, but is relevant to the primary entity under review’s Primary Mission assessment under the general Primary Mission standards for entities with Affiliates, must meet the Primary Mission-related requirements applicable to such entities (see “Primary Mission for Entities with an Affiliate(s)”). The entities who may be involved include each Affiliate, other than a tribal government, that engages in eligible Financial Products and/or eligible Financial Services activity or that Controls the primary entity under review even if that Controlling Affiliate does not engage in any eligible Financial Products or eligible Financial Services activity.

All related entities subject to the CDFI Certification collective review process that are separately Certified CDFIs or Community Development Entities (CDEs), as well as those whose sole activity is the participation in other federal financing programs, are presumed to meet the CDFI Certification primary mission requirements.

<b>NOTE</b>	<p>Confirmation of an entity’s line of business, as evidenced by its organizing documents, is subject to review during CDFI Certification compliance checks. Related entities subject to the CDFI Certification collective review process that engage in additional activities other than the administration of another federal financing program is not covered by this exemption.</p> <p>Affiliates that are separately Certified CDFIs or Community Development Entities (CDEs) when the CDFI Certification review of the other entity is being conducted, as well as Affiliates whose sole activity is the participation in other federal financing programs are presumed to meet the CDFI Certification primary mission requirements. Applicant may select “N/A - Affiliate is either a Certified CDFI, Certified CDE, or Solely Engaged in Federal Financing Activity” in the Affiliate – Primary Mission section data-fields of the CDFI Certification Application for any applicable Affiliate relevant to the CDFI Certification review.</p>
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## **Primary Mission and Tribal Governments**

Entities seeking to obtain or maintain CDFI Certification that are 1) tribal governments or 2) Affiliated with a tribal government or 3) any entity relevant to another entity's CDFI Certification review that is Affiliated with a tribal government, must meet all applicable Primary Mission requirements; however, if a tribal government is relevant to another entity's CDFI Certification review, the tribal government is not required to meet any Primary Mission requirements in connection with that other entity's CDFI Certification.

## **Primary Mission and the CDFI Certification Spin-off Provision**

As noted above, if an Applicant seeks to use the [CDFI Certification provision for Spin-off entities](#), it must meet the CDFI Certification primary mission timeframe requirement by demonstrating that either it or an eligible Spin-off-related Affiliate had the promotion of community development its primary mission for at least the full six calendar months immediately prior to submission of the Spin-off's CDFI Certification Application.

Spin-offs must also demonstrate that each Affiliate is relevant under the general family of entities Primary Mission requirements, except if the relevant Affiliate or related entity is a tribal government.



### ***Collective Review***

Spin-offs subject to the CDFI Certification collective review must demonstrate that each related entity relevant to their collective review process individually meets all applicable Primary Mission requirements.

## **Primary Mission and Mission Documentation**

To demonstrate its mission, an entity must have one of the following types of governing leadership-approved documents that clearly state its mission or purpose: governing leadership-approved organizing document (e.g., articles of incorporation, charter, or similar), governing leadership-approved governance document (e.g., bylaws, operating agreement, partnership agreement, or similar), governing leadership-approved resolution or directive. If a governing leadership-approved resolution/directive will be used to demonstrate an entity's mission, the purpose of the resolution/directive must be to establish the mission. A resolution/directive that identifies an entity's mission as part of the background information on why the resolution/directive is being made will not be accepted as proof of mission.

### ***Documenting that community development is an entity's primary mission***

To demonstrate that an entity's primary mission is the promotion of community development, the mission document provided must clearly indicate that community development is the entity's PRIMARY purpose. Language that indicates a community development purpose includes references to providing responsible Financial Products and Financial Services to Low-Income individuals, Other Targeted Populations recognized for CDFI Certification purposes, or residents of or businesses located in economically distressed communities; promoting affordable housing, the availability and viability of Community Facilities (i.e., facilities where health care, childcare, educational, cultural, or social services are provided), or economic development, particularly in distressed areas; or supporting the provision of

community services such as child care, education, health care, social services, or workforce development.

### **Documenting the length of time that a particular mission has been in place**

The CDFI Fund considers a mission to be effective as of the date when formal action was taken by an entity's governing leadership to recognize or authorize that mission. For a mission's effective date to be recognized by the CDFI Fund, there must be documentation of the recognizing/authorizing action from the date when that action was purportedly taken. Attesting or resolving that action was previously taken to recognize or authorize a mission is not accepted as evidence of a mission's earlier effective date.

Evidence that a document is governing leadership-approved: See corresponding information in the Basic Information section of this guidance.

### ***Affiliate mission that supports and/or is consistent with that of the Applicant's Primary Mission***

#### **[CLARIFYING UPDATE 07/05/2025]**

An Affiliate mission that supports or is consistent with that of the Applicant's would be one that may broadly benefit a community even if it is not specifically focused on community development. For example, a parent entity (i.e., the Controlling Affiliate) that has a mission related to environmental protection or sustainability may be considered consistent with a mission of community development, especially if the Applicant offers climate-related financing to a Target Market. Similarly, an Affiliate that offers responsible Financial Products to non-Target Market moderate income borrowers may also be considered to have a mission consistent with an Applicant's community development mission.

A covered Affiliate that is primarily profit-driven, targets higher-income/wealth populations, or whose activities do not provide an apparent benefit to a Target Market might be considered to not have a mission that is consistent with an Applicant's community development mission, unless it could show that substantial portion of the Affiliate's profits are directed at subsidizing activities of the Applicant to further community development in the Target Market.

### **Primary Mission and the Community Development Strategy**

An entity seeking to obtain or maintain CDFI Certification must be able to demonstrate that it has an active, current community development strategy such that the eligible Financial Products or eligible Financial Services activity it engages in supports a community development objective(s) for an underserved population(s) recognized by the CDFI Fund as Targeted Population or for residents of an economically distressed community(ies). To demonstrate that it has an acceptable community development strategy, an entity must have either:

- An active, current governing leadership-approved strategic plan that provides evidence of its community development strategy.
- If it does not have an active, current strategic plan or if its strategic plan does not properly evidence its community development strategy (either because a community development strategy is not referenced at all or it is not clearly referenced in the strategic plan), a governing leadership-approved narrative that describes the active, current community development strategy, including outcomes expected to result from its eligible Financial Products or eligible Financial Services activity

and how that eligible Financial Product or eligible Financial Services activity leads to those outcomes.

As evidence of a community development strategy, an entity's strategic plan or narrative should include references to:

- The geographic or demographic market(s) served by the entity (must include an underserved population[s] recognized by the CDFI Fund as a Targeted Population or residents of an economically distressed community[ies]) and the needs of or opportunities in that market(s), which might include quantitative data or qualitative input from members of the applicable market(s);
- One or more community development goals and objectives or how the entity intends to meet those goals and objectives; ***and***
- How the entity's eligible Financial Products or eligible Financial Services activity, Development Services, and, if applicable, other activities are expected to improve the social or economic conditions of the market(s) served.

For CDFI Certification Applicants, the community development strategy must have been approved by their governing leadership on or before the date the CDFI Certification Application is submitted.

### **Primary Mission and Responsible Financing Practices**

To meet the CDFI Certification Primary Mission standards for responsible financing practices, an entity seeking to obtain or maintain CDFI Certification should provide Financial Products and Financial Services that are consistent with promoting community development. Such Financial Products should not harm consumers, be affordable, be originated based upon an assessment of whether a borrower can pay back a loan and have terms and conditions that are transparent and understandable to the borrower. Entities seeking to obtain or maintain CDFI should practice transparency, fair collections, and compliance with federal, State, and local laws and regulations. The CDFI Fund also considers the safety, affordability, and transparency of an entity's Financial Services to be an important aspect of its commitment to community development.

The CDFI Certification Application asks a series of questions related to eligible Financial Products and eligible Financial Services activity engaged in by the entity seeking to obtain or maintain CDFI Certification (and by each of its Affiliates or other entities relevant to its CDFI Certification review) to determine whether that activity is consistent with the responsible financing principles and with a commitment to community development. These questions apply to *all* eligible Financial Products and eligible Financial Services activity engaged in by an Applicant and each of its Affiliates or other entities relevant to its CDFI Certification review, not only those directed to an allowable Target Market component(s).

### ***CDFI Certification and Disqualifying Financing Practices***

Any entity seeking to obtain or maintain CDFI Certification that either directly engages in or has an Affiliate or other entity relevant to its CDFI Certification review that engages in the following financing practices is ineligible for CDFI Certification:

- Originates or otherwise offers loans that exceed the interest limits that apply to non-depository institutions in the State where the borrower resides;

- Offers consumer loans that allow for an APR in excess of 36%,<sup>5</sup> ***and***
  - The loans have an annual default rate over 5%;
  - The loans in question include a leveraged payment mechanism;
  - Any such loans of \$1,000 or less have repayment timeframes that exceed 12 months;
  - For a period of 12 full months after the issuance of any such loan, it does not waive any upfront fees for any refinance or new loan issued to the same borrower;
  - Any fees associated with such installment loans are not spread evenly over the life of the loan or pro rata refundable in the event of early repayment (including through a refinance);  
*or*
  - All payments on any such installment loans are *not* substantially equal and do not amortize smoothly to a zero balance by the end of the loan term;
- Offers covered<sup>6</sup> single-family, owner-occupied, residential mortgage loan products secured by a non-subordinate lien
  - For which it fails to verify the income or assets of the borrower;
  - That include negative amortization or interest-only payments;
  - That charge upfront points and fees to the consumer in excess of 3%, or in excess of the qualified mortgage limits for smaller loans; or
  - That are underwritten at less than the maximum rate in the first five years;
- Sells its charged-off consumer or small business debt to debt buyers;
- Has a current community reinvestment act rating below satisfactory;

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<sup>5</sup> If a Certified CDFI has attested that neither it, nor any Affiliate or other entity relevant to its CDFI Certification review, offers consumer or small business loans that allow for an APR in excess of 36% and later determines that a transaction's APR exceeds 36%, the CDFI may remain eligible for CDFI Certification without having to meet the additional conditions for consumer loans above 36% provided, within 210 days after consummation, any necessary rate correction is made and the consumer is paid the dollar amount by which the transaction's total points and fees and/or interest payments caused the transaction to exceed a 36% APR.

<sup>6</sup> For purposes of question PM19 regarding an entity's mortgage loan products, a covered mortgage loan product is limited to a consumer credit transaction that is secured by a lien on a single-family, owner-occupied residence *other than*

- (i) transactions secured by a subordinate lien;
- (ii) a reverse mortgage subject to 12 CFR [1026.33](#);
- (iii) a temporary or "bridge" loan with a term of 12 months or less, such as a loan to finance the purchase of a new dwelling where the consumer plans to sell a current dwelling within 12 months or a loan to finance the initial construction of a dwelling;
- (iv) a construction phase of 12 months or less of a construction-to-permanent loan;
- (v) an extension of credit made pursuant to a program administered by a Housing Finance Agency, as defined under 24 CFR 266.5;
- (vi) an extension of credit made pursuant to a program administered by the U.S. Department of Housing and Urban Development, the U.S. Department of Veterans Affairs, or the U.S. Department of Agriculture;
- (vii) a transaction that does not require payment of interest;
- (viii) a transaction made for the purpose of foreclosure avoidance or prevention; or
- (ix) for loans with interest-only payments and loans with balloon payments, a transaction with a payment schedule that is adjusted to the seasonal or irregular income of the consumer.

- Uses its equity investment Financial Products to gain control over an investee (except if the applicant must save a business through ownership as a last resort for a limited period of time); or
- Leverages, for its own benefit, the assets of any of its active equity investees.

For purposes of determining the highest allowable APR for any consumer loan products, the CDFI Fund requires that the methodology prescribed in [32 CFR 232.4 of the Military Lending Act](#) (referred to as the Military Annual Percentage Rate [MAPR]) be used, *regardless of covered borrower status*.<sup>7</sup>

### ***CDFI Certification and Financing Practices Requiring Further Explanation***

Unless an acceptable explanation of how the below practices have a community development purpose consistent with the principles described in this section is provided, an entity may also be determined to be ineligible for CDFI Certification if it or any Affiliate or other entity relevant to its CDFI Certification review engages in the following activities:

- Does not evaluate the ability of certain mortgage, consumer, or small business borrowers to pay back a loan;
- Offers small business<sup>8</sup> loans that allow for an APR in excess of 36%; offers covered mortgages with balloon payments or that carry an original maximum term longer than 30 years (unless offered through a government program); or
- Charges excessive overdraft or nonsufficient funds (NSF) fees or has practices that are related to these fees that are harmful.

For purposes of determining the highest allowable APR for any small business loan products, the standard Truth in Lending Act (TILA) methodology in [12 CFR 1026](#) (Regulation Z) must be used.

Other questions provide an opportunity for community development intent to be further demonstrated, such as how struggling borrowers are assisted. Depository institutions must also provide information on checking or share account features they offer.

Beginning January 1, 2026, an entity will be ineligible for CDFI Certification if it or each entity relevant to its CDFI Certification review offers small business loan products and does not disclose in writing the periodic payment due, the total amount to be repaid over the life of the loan, the total finance charges over the life of the loan, and APR. Certified CDFIs that offer or that have entities relevant to their CDFI Certification review that offer small business loan products will be required to attest in their ACR about

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<sup>7</sup> The CDFI Fund does not require that an entity calculate, disclose, or report the MAPR of its consumer loan products unless otherwise required by statute or regulation to do so. Entities must attest to whether or not any of its consumer loan products “allow for” an MAPR in excess of 36% MAPR. If so, entities must respond to a set of secondary questions about the loan product’s characteristics. For additional guidance on calculating the MAPR, see the Consumer Financial Protection Bureau’s (CFPB) Military Lending Act (MLA), Interagency Examination Procedures--2015 Amendments, Terms of Consumer Credit Extended to Covered Borrowers (Calculation of MAPR), 32 CFR 232.4, pp. 6-9.

<sup>8</sup> For purposes of CDFI Certification, “small business” has the same meaning as the term “small business concern” in 15 U.S.C. 632(a), as implemented in 13 CFR 121.101 through 121.107. Notwithstanding the size standards set forth in 13 CFR 121.201, for purposes of this subpart, a business is a small business if its gross annual revenue, as defined in § 1002.107(a)(14), for its preceding fiscal year is \$5 million or less.

the making of such disclosures no later than October 1, 2026, in order to maintain their CDFI Certification.

### ***Obtaining Determination to Amend a Responsible Financing Practices Standard(s)***

The current responsible financing practices standards established in connection with the CDFI Certification Primary Mission test allow for certain circumstances under which eligible Financial Products or eligible Financial Services activity involving an otherwise disqualifying practice(s) might still be acknowledged as serving an acceptable community development purpose and would, therefore, not prevent an entity engaging in such activity or that has an Affiliate or other entity relevant to its CDFI Certification collective review process that engages in such activity from being able to obtain or maintain the CDFI Certification. For example, entities that offer consumer loans that exceed an annual percentage rate (APR) of 36% may still be determined eligible for Certification if certain conditions are met for that product, such as that product having, among other conditions, a default rate no greater than 5%, a limit on fees to refinance a relevant loan, or substantially equal loan payments that amortize to a zero balance. Similarly, certain otherwise disqualifying residential real estate mortgage loan characteristics are allowable for the purposes of CDFI Certification if additional criteria are met.

Entities that engage in, or that have an Affiliate or other entity relevant to their CDFI Certification review that engage in, eligible Financial Products or eligible Financial Services activity that do not meet a current responsible financing practices standard(s) in connection with the CDFI Certification Primary Mission test, nor demonstrate any relevant existing additional criteria that would enable such activity to be acknowledged as serving an acceptable community development purpose, may seek an amendment to the relevant responsible financing practices standard(s). For CDFI Certification Applicants, approval of any such amendment must be received before the CDFI Certification Application is submitted.

For information on how to request an amendment to a current CDFI Certification responsible financing practices standard(s), please see "[Obtaining Determination to Amend a Responsible Financing Practices Standard\(s\)](#)".

### **Completing the CDFI Certification Application Primary Mission Section**

**To complete the Primary Mission section of the CDFI Certification Application, an Applicant will:**

- Create or review and, if needed, update the Applicant's community development strategy either in a governing leadership-approved strategic plan or via a governing leadership-approved community development strategy narrative.
- Review and, if needed, provide or correct any information intended to be auto populated into the CDFI Certification Application Primary Mission section fields.
- Complete the non-auto populated Primary Mission section field(s).
- The responsible financing practices fields must be completed for each Affiliate and/or other entity relevant to the Applicant's CDFI Certification Primary Mission review that engages in eligible Financial Products and/or eligible Financial Services activity.
- While the field labels/questions and/or other text prompts for the fields used to present Primary Mission-related information on Affiliates and/or other entities relevant to the Applicant's CDFI Certification Primary Mission review may indicate that information need only be presented on the

Applicant’s relevant Affiliates, this information must actually be presented for each entity relevant to the Applicant’s CDFI Certification Primary Mission review, even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.

- While the field labels/questions and/or other text prompts for the fields used to present Primary Mission related information on Affiliates and/or other entities relevant to the Applicant’s CDFI Certification Primary Mission review may indicate that information need only be presented on the Applicant’s relevant Affiliates, this information must actually be presented for each entity relevant to the Applicant’s CDFI Certification Primary Mission review, even if the relevant entity does not qualify as an Affiliate of the Applicant as defined by the CDFI Fund.
- If the CDFI Certification Application form does not allow responsible financing practices information to be presented separately and independently for each Affiliate and/or other entity relevant to the Applicant’s CDFI Certification Primary Mission review that engages in eligible Financial Products and/or eligible Financial Services activity, provide responses to the responsible financing practices fields for each such entity separately and independently via a document attached to field BI21 in the Basic Information section of the Application. Name the attachment: “Responsible financing practices info – Affiliates and/or other entities relevant to Primary Mission review.”
- Attach copies of all required documentation.

<b>NOTE</b>	CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.
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### 5.5.1. Applicant – Primary Mission

To become a Certified CDFI, the promotion of community development must be an Applicant’s governing leadership-approved primary mission for at least the most recent six full calendar months.

#### **Applicant - Primary Mission – (PM) Data Fields**

Field	PM01	Field Type	Picklist
Field Label/Question Text	Indicate the type(s) of document(s) presented as evidence of the Applicant’s current primary mission of promoting community development.		
Response	Select all that apply: <ul style="list-style-type: none"> <li>Legal Entity documents.</li> <li>Bylaws.</li> <li>Governing or managing board resolution.</li> <li>Owner resolution/ directive.</li> </ul>		

Response Instruction(s)			
<p>Select the appropriate response to identify the type(s) of document(s) being presented as evidence that the Applicant has the promotion of community development as its current binding mission.</p> <div style="border: 1px solid black; background-color: #fff9c4; padding: 5px; margin: 10px 0;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div> <p>Select owner resolution/directive if a governing leadership-approved resolution/directive will be used to demonstrate an entity’s mission, but the governing leadership for the entity whose mission information is being presented is not a governing board.</p> <p>If a governing leadership-approved resolution/directive will be used to demonstrate an entity’s mission, the purpose of the resolution/directive must be to establish the mission. A resolution/directive that identifies an entity’s mission as part of the background information on why the resolution/directive is being made will not be accepted as proof of mission.</p> <p>The documentation provided must include evidence that the relevant document is binding via clear acceptable evidence (in one of the ways allowed by the CDFI Fund) of its approval by the governing leadership of the entity whose mission is being presented and its approval date or the document will not be considered valid, which may result in the decline of the CDFI Certification Application. For information on evidence of governing leadership approval accepted for CDFI Certification purposes, see “Evidence that a Document is Governing Leadership-Approved” in the CDFI Certification – Documentation Requirements section this guidance manual.</p> <p>The name of the entity whose mission is being presented must show clearly in the mission document and must match its current entity name as it appears in its AMIS account or documentation filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry linking the entity name in the governance document to the current entity name in AMIS must be provided.</p> <p>The effective date of the current mission document must be as of or prior to the date of submission of the CDFI Certification Application.</p> <p>Mission documentation must be provided for each entity relevant to the review of the Applicant’s compliance with the CDFI Certification Primary Mission requirements.</p>			
Field	PM02	Field Type	Attachment
Field Label/Question Text	<p>Attach all document(s) needed to evidence the Applicant’s:</p> <ul style="list-style-type: none"> <li>Current primary mission of promoting community development;</li> <li>Governing or managing board or owner approval of the current mission; and</li> <li>Date the current mission went into effect.</li> </ul>		
Response	Attach all documents		

Response Instruction(s)			
<p>Attach the document(s) identified in the preceding field that evidences the Applicant’s current binding mission.</p> <p>By saying that there must be evidence of governing or managing board or owner approval of the current mission, the CDFI Fund means that the mission must have been approved by the entity’s governing leadership and that the document(s) provided to demonstrate the current mission must include evidence of that governing leadership approval.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div>			
Field	PM03	Field Type	Picklist
Field Label/Question Text	Indicate how the document(s) demonstrate governing or managing board or owner approval of the Applicant’s current mission documentation		
Response	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>A. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified indicates the document was approved by the governing leadership and specifies its approval date.</li> <li>B. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document, but clearly references it, indicates the document or the governing leadership decision it records was approved by the governing leadership and specifies its approval date.</li> <li>C. Document evidences that it was filed with a government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.</li> <li>D. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer</li> </ul>		

	<p>authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.</p> <p>E. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.</p>
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**Response Instruction(s)**

Select the appropriate response(s) to identify how the attached mission related documentation evidences that it is approved by the Applicant’s governing leadership.

By governing or managing board or owner approval, the CDFI Fund means governing leadership approval.

The documentation provided must show that the relevant document is binding via clear acceptable evidence (in one of the ways allowed by the CDFI Fund) of its approval by the Applicant’s governing leadership and its approval date or the document will not be considered valid, which may result in the decline of the CDFI Certification Application. For information on evidence of governing leadership approval accepted by the CDFI Fund for CDFI Certification purposes, see [“Evidence That a Document Is Governing Leadership-Approved”](#) in the CDFI Certification – Documentation Requirements section of this guidance manuals.

**The letter response options in the Application form represent each of the following responses which correspond with the applicable letter:**

- A. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified that indicates the document was approved by the governing leadership and specifies its approval date.
- B. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document, but clearly references it, indicates that the document or the governing leadership decision it records was approved by the governing leadership and specifies its approval date.
- C. Document provides evidence that it was filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.
- D. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed

<p>with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.</p> <p>E. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.</p>			
<b>Field</b>	<b>PM04</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Indicate how the document(s) demonstrates the date the current mission went into effect		
<b>Response</b>	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• The document(s) shows the date it was adopted via the date it was signed.</li> <li>• The document(s) is supplemented by official governing leadership meeting minutes that clearly indicate the date of the meeting at which the document(s) was adopted.</li> <li>• The document(s) is supplemented by a statement that clearly indicates the date the document(s) was approved by the governing or managing board or owner.</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response to confirm how the mission-related documentation evidences the date when the mission became effective.			
<b>Field</b>	<b>PM05</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Applicant’s current mission as stated in the attached mission documentation		
<b>Response</b>	Enter current mission		
<b>Response Instruction(s)</b>			
Enter the Applicant’s current mission, verbatim, as it appears and can be confirmed in the attached mission-related documentation.			

<b>Field</b>	<b>PM06</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Page number(s) in the attached mission documentation where the Applicant’s current mission is articulated.		
<b>Response</b>	Enter page number(s)		
<b>Response Instruction(s)</b>			
Enter the exact page number(s) in the attached mission document(s) where the current mission can be found.			
<b>Field</b>	<b>PM07</b>	<b>Field Type</b>	Date
<b>Field Label/Question Text</b>	Enter the date that the Applicant’s current mission was formally approved.		
<b>Response</b>	Enter date		
<b>Response Instruction(s)</b>			
<p>Enter the date when the governing leadership-approved current mission evidenced in the provided documentation went into effect.</p> <p>While the label/question for this field indicates that the date a mission was approved by the Applicant’s governing leadership, the response should provide the date when the mission went into effect, except in the case of backdating. The effective date may sometimes be after its approval date. Backdating is not allowed. For CDFI Certification purposes, a mission’s effective date is the date documentable action was taken to approve it or thereafter.</p>			
<b>Field</b>	<b>PM08</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Date by which an appropriate primary mission must have been in place.		
<b>Response</b>	Auto populated		
<b>Response Instruction(s)</b>			
<p>The Application will display the date by which the Applicant’s primary mission of promoting community development must have been in effect.</p> <p>Applicants must demonstrate that the promotion of community development has been their primary mission for the six consecutive full calendar months just prior to submission of the CDFI Certification Application.</p> <p>If the Applicant is a DIHC that does not engage in its own direct eligible Financial Products activity, then it must demonstrate that the promotion of community development has been the primary</p>			

mission of each entity relevant to its collective review process that engages in eligible Financial Products and, if applicable, eligible Financial Services activity.			
<b>Field</b>	<b>PM09</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Is the date by which an appropriate primary mission was formally approved less than six months?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the current primary mission of promoting community development for the entity whose mission information is being presented went into effect less than six consecutive full calendar months prior to the date of submission of the CDFI Certification Application.</p> <p>Select the appropriate response to indicate whether the current primary mission of promoting community development for the entity whose mission information is being presented went into effect less than six consecutive full calendar months prior to the date of submission of the CDFI Certification Application.</p> <p>While the label/question for this field indicates that the date a mission was approved by the entity’s governing leadership, the response should provide the date when the mission went into effect, except in the case of backdating. The effective date may sometimes be after its approval date. Back-dating is not allowed. For CDFI Certification purposes, a mission’s effective date is the date documentable action was taken to approve it or thereafter.</p>			
<b>Field</b>	<b>PM09.1</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Indicate the type(s) of document(s) presented as evidence that the Applicant had an immediate prior primary mission of promoting community development.		
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• Legal Entity documents.</li> <li>• Bylaws.</li> <li>• Governing or managing board resolution.</li> <li>• Owner resolution/directive.</li> </ul>		
<b>Response Instruction(s)</b>			
<p><b>If “Yes,”</b> the date the Applicant’s current mission went into effect is less than the six consecutive full calendar months just prior to the submission of the CDFI Certification Application:</p> <p>Select the appropriate response to indicate the type(s) of document(s) presented as evidence that the entity had the promotion of community development as its immediate prior primary mission.</p>			

<p>While the label/question for this field indicates that the response for this field should reflect the Applicant’s status, it should actually reflect the status of whatever entity’s mission information is being presented.</p> <p>Select owner resolution/directive if a governing leadership-approved resolution/directive will be used to demonstrate an entity’s mission, but the governing leadership for the entity whose mission information is being presented is not a governing board.</p> <p>If a governing leadership-approved resolution/directive will be used to demonstrate an entity’s mission, the purpose of the resolution/directive must be to establish the mission. A resolution/directive that identifies an entity’s mission as part of the background information on why the resolution/directive is being made will not be accepted as proof of mission.</p>			
<b>Field</b>	<b>PM09.2</b>	<b>Field Type</b>	<b>Attachment</b>
<b>Field Label/Question Text</b>	<p>Attach all document(s) needed to evidence the Applicant’s</p> <ul style="list-style-type: none"> <li>• Immediate prior primary mission of promoting community development;</li> <li>• Governing or managing board or owner approval of the immediate prior mission; and</li> <li>• Date when the immediate prior mission went into effect.</li> </ul>		
<b>Response</b>	Attach document(s)		
<b>Response Instruction(s)</b>			
<p>Attach the document(s) identified in the preceding field that evidences the entity’s immediate prior binding mission.</p> <p>By saying that there must be evidence of governing or managing board or owner approval of the immediate prior mission, the CDFI Fund means that the mission must have been approved by the entity’s governing leadership and that the document(s) provided to demonstrate the immediate prior mission must include evidence of that governing leadership approval.</p> <p>The mission document(s) must also evidence when the immediate prior mission went into effect.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div>			
<b>Field</b>	<b>PM09.3</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Indicate how the document(s) demonstrates governing or managing board or owner approval of the Applicant’s immediate prior mission documentation.		
<b>Response</b>	Select all that apply:		

	<ul style="list-style-type: none"> <li>A. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified that indicates the document was approved by the governing leadership and specifies its approval date.</li> <li>B. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document, but clearly references it, indicates that the document or the governing leadership decision it records was approved by the governing leadership and specifies its approval date.</li> <li>C. Document provides evidence that it was filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.</li> <li>D. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.</li> <li>E. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.</li> </ul>
<b>Response Instruction(s)</b>	
Select the appropriate response to indicate how the document(s) provided demonstrates the governing leadership’s approval of the immediate prior mission.	

By governing or managing board or owner approval, the CDFI Fund means governing leadership approval.

The documentation provided must show that the relevant document is binding via clear acceptable evidence (in one of the ways allowed by the CDFI Fund) of its approval by the Applicant’s governing leadership and of its approval date or the document will not be considered valid, which may result in the decline of the CDFI Certification Application. For information on evidence of governing leadership approval accepted by the CDFI Fund for CDFI Certification purposes, see “[Evidence That a Document Is Governing Leadership-Approved](#)” in the CDFI Certification – Documentation Requirements section of this guidance manual.

**The letter response options in the Application form represent each of the following responses which correspond with applicable letter:**

- A. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified that indicates the document was approved by the governing leadership and its approval date.
- B. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document, but clearly references it, indicates that the document or the governing leadership decision it records was approved by the governing leadership and specifies its approval date.
- C. Document provides evidence that it was filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.
- D. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.
- E. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.

Field	PM09.4	Field Type	Picklist
Field Label/Question Text	Indicate how the document(s) demonstrates the date the immediate prior mission went into effect.		
Response	Select all that apply: <ul style="list-style-type: none"> <li>• The document(s) shows the date it was adopted via the date it was signed.</li> </ul>		

<ul style="list-style-type: none"> <li>• The document(s) is supplemented by official governing leadership meeting minutes that clearly indicate the date of the meeting at which the document(s) was adopted.</li> <li>• The document(s) is supplemented by a statement that clearly indicates the date the document(s) was approved by the governing or managing board or owner.</li> </ul>			
<b>Response Instruction(s)</b>			
Select the appropriate response that indicates how the document(s) demonstrates the date the immediate prior mission went into effect.			
<b>Field</b>	<b>PM09.5</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Enter the Applicant’s immediate prior mission exactly as stated in the attached mission documentation.		
<b>Response</b>	Enter mission statement(s).		
<b>Response Instruction(s)</b>			
Enter the immediate prior mission, verbatim, from the attached primary mission related document(s).			
<b>Field</b>	<b>PM09.6</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	For each type of document presented as evidence of the Applicant’s immediate prior mission, enter the page number(s) in that document where the immediate prior mission is articulated.		
<b>Response</b>	Enter page number(s).		
<b>Response Instruction(s)</b>			
Direct the CDFI Fund to the exact page numbers(s) for each type of document presented as evidence of the entity’s immediate prior mission and enter the page number(s) in that document where the immediate prior mission is articulated.			
<b>Field</b>	<b>PM09.7</b>	<b>Field Type</b>	Date
<b>Field Label/Question Text</b>	Enter the date that the Applicant’s immediate prior mission was formally approved by its governing or managing board or owner.		
<b>Response</b>	Enter date.		

**Response Instruction(s)**

If the date the entity's most recent *prior* mission is still less than six complete, full months prior to the submission of the CDFI Certification Application, repeat the *prior* mission documentation questions, as needed, until a full six-month's timeframe has been provided.

By approved by a governing or managing board or owner, the CDFI Fund means approved by the entity's governing leadership.

*Repeat the prior mission documentation fields, as needed, until mission documentation for **at least six consecutive full calendar months** prior to the submission of the CDFI Certification Application has been provided.*

### 5.5.2. Applicant – Community Development Strategy

An entity seeking to obtain or maintain CDFI Certification must be able to demonstrate that it has an active, current community development strategy such that the eligible Financial Products or eligible Financial Services activity it engages in supports a community development objective(s) for an underserved population(s) recognized by the CDFI Fund as Targeted Population or for residents of an economically distressed community(ies). To demonstrate that it has an acceptable community development strategy, an entity must have either:

- An active, current governing leadership-approved strategic plan that provides evidence of its community development strategy.
- If it does not have an active, current strategic plan or if its strategic plan does not properly evidence its community development strategy (either because a community development strategy is not referenced at all or it is not clearly referenced in the strategic plan), a governing leadership-approved narrative that describes the active, current community development strategy, including outcomes expected to result from its eligible Financial Products or eligible Financial Services activity and how that eligible Financial Product or eligible Financial Services activity leads to those outcomes.

As evidence of a community development strategy, an entity's strategic plan or narrative should include references to:

- The geographic or demographic market(s) served by the entity (must include an underserved population[s] recognized by the CDFI Fund as a Targeted Population or residents of an economically distressed community[ies]) and the needs of or opportunities in that market(s), which might include quantitative data or qualitative input from members of the applicable market(s);
- One or more community development goals and objectives or how the entity intends to meet those goals and objectives; ***and***
- How the entity's eligible Financial Products or eligible Financial Services activity, Development Services, and, if applicable, other activities are expected to improve the social or economic conditions of the market(s) served.

For CDFI Certification Applicants, the community development strategy must have been approved by their governing leadership on or before the date the CDFI Certification Application is submitted.

**Applicant –Community Development Strategy – (PM) Data Fields**

Field	PM10	Field Type	Picklist
Field Label/Question Text	What are the Applicant’s community development objective(s) that address the social and/or economic conditions of underserved people and/or residents of economically distressed communities?		
Response	Select all that apply: <ul style="list-style-type: none"> <li>Promote housing opportunity.</li> <li>Promote financial access (e.g., access to capital in persistent-poverty communities).</li> <li>Promote economic development.</li> <li>Promote the development of Community Facilities.<sup>9</sup></li> <li>Promote infrastructure development.</li> <li>Promote the availability of community services (such as childcare, education, health care, social services, workforce development).</li> <li>Promote community revitalization.</li> <li>Promote the availability of consumer products/services.</li> <li>Promote the closure of the racial wealth gap.</li> <li>Promote the creation of quality jobs.</li> <li>Promote business development.</li> <li>Promote increased energy, water, and/or location efficiency.</li> <li>Promote financial inclusion and access to affordable Financial Services, particularly for the un- and underbanked and/or in banking deserts (depository institutions only).</li> <li>Other</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response that identifies Applicant’s community development objective(s) that address the social and/or economic conditions of underserved people and/or residents of economically distressed communities.			
<i>If PM10 is “Other”, PM10.1 will become visible for the Applicant;</i>			
Field	PM10.1	Field Type	Text
Field Label/Question Text	If “Other,” describe the objective and explain why it can be considered a community development objective.		

<sup>9</sup> “Community Facility” means a facility where health care, child care, educational, cultural, or social services are provided.

Response	Provide explanation		
<b>Response Instruction(s)</b>			
<p>If <b>“Other”</b> was selected in PM10, fully describe the objective and explain why it can be considered a community development objective. Applicant’s narrative must include references to the geographic and/or demographic market served by the entity and the needs of and/or opportunities in that market, which might include quantitative data or qualitative input from members of that market.</p>			
Field	PM11	Field Type	Picklist
Field Label/Question Text	<p>For each community development objective selected in question <b>PM09</b>, identify the type of goal(s) supported by the Financial Product(s) in which the Applicant engages.</p>		
Response	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• Business development.</li> <li>• Asset/wealth building.</li> <li>• Homeless/transitional housing/services.</li> <li>• Senior housing/services.</li> <li>• Community Facilities development/ improvements.</li> <li>• Special needs housing/services.</li> <li>• Accessibility modifications.</li> <li>• Affordable housing.</li> <li>• Job creation/retention</li> <li>• Charter school development.</li> <li>• Community health care centers development.</li> <li>• Commercial real estate development.</li> <li>• Climate resilience.</li> <li>• Reduced poverty and/or inequality.</li> <li>• Credit-building.</li> <li>• Financial stability.</li> <li>• Other.</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response that identifies the type of goal(s) supported by the Financial Product(s) in which the Applicant engages. The Applicant must refer to the community development objectives selected in <b>PM10</b>.</p>			
<p><i>If PM11 is “Other”, PM11.1 will become visible for the Applicant;</i></p>			
Field	PM11.1	Field Type	Text
Field Label/Question Text	<p>If <b>“Other,”</b> describe.</p>		

<b>Response</b>	Provide description.		
<b>Response Instruction(s)</b>			
<p>If “Other” was selected in PM11, describe the “other” type of goal(s) supported by the Financial Product(s) in which the Applicant engages. Applicant’s narrative must include references to how the other goals selected are supported by the eligible Financial Products in which the Applicant engages to improve social or economic conditions in the relevant market.</p>			
<b>Field</b>	<b>PM12</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant have a board- or owner-approved strategic plan that provides evidence of a community development strategy?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant has a board- or owner-approved strategic plan that provides evidence of a community development strategy.			
<b><i>If PM12 is “Yes”, PM12.1 - PM12.3 will become visible for the Applicant</i></b>			
<b>Field</b>	<b>PM12.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p><b>If “Yes,”</b> Indicate how the document(s) demonstrate governing board or owner approval of the Applicant’s strategic plan that provides evidence of a community development strategy.</p>		
<b>Response</b>	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>A. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified that indicates the document was approved by the governing leadership and its approval date.</li> <li>B. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document, but clearly references it, indicates that the document or the governing leadership decision it records was approved by the governing leadership and specifies its approval date.</li> </ul>		

	<ul style="list-style-type: none"> <li>C. Document provides evidence that it was filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.</li> <li>D. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.</li> <li>E. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.</li> </ul>
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**Response Instruction(s)**

Select the appropriate response to indicate how the document(s) demonstrates the governing leadership’s approval of the Applicant’s strategic plan which provides evidence of a community development strategy.

By governing or managing board or owner approval, the CDFI Fund means governing leadership approval.

**The letter response options in the Application form represent each of the following responses which correspond with the applicable letter:**

- A. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified that indicates the document was approved by the governing leadership and specifies its approval date.
- B. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document, but clearly references it, indicates that the document or the governing leadership decision it records was approved by the governing leadership and specifies its approval date.

- C. Document provides evidence that it was filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.
- D. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.
- E. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.

Field	PM12.2	Field Type	Attachment
Field Label/Question Text	Attach board- or owner-approved strategic plan that provides evidence of a community development strategy.		
Response	Attach document(s).		

**Response Instruction(s)**

Attach the governing leadership-approved strategic plan that provides evidence of a community development strategy.

**NOTE:** CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.

**[CLARIFYING UPDATE 07/05/2025]**

- The Applicant’s governing leadership-approved strategic plan must include references to:
- Geographic and/or demographic market served and the needs and/or opportunities with quantitative data or qualitative input from members of that market;
  - Community development goals and objectives and how the entity plans to achieve them; and
  - How eligible Financial Products and/or Financial Services and Development Services are expected to improve social or economic conditions in the relevant market.

<b>Field</b>	<b>PM12.3</b>	<b>Field Type</b>	<b>Numeric</b>
<b>Field Label/Question Text</b>	Identify the page number(s) from the attached document(s) where the community development strategy is articulated.		
<b>Response</b>	Enter page number(s).		
<b>Response Instruction(s)</b>			
Direct the CDFI Fund to the exact page number(s) from the attached document(s) where the community development strategy is articulated.			
<b><i>If PM12 is "No", PM12.4 - PM12.5 will become visible for the Applicant</i></b>			
<b>Field</b>	<b>PM12.4</b>	<b>Field Type</b>	<b>Attachment</b>
<b>Field Label/Question Text</b>	<p><b>If "No"</b> (i.e., if the Applicant does not have a board- or owner-approved strategic plan, or if that strategic plan does not clearly evidence a community development strategy):</p> <p>Attach a brief board- or owner-approved narrative that describes the community development outcomes that the Applicant believes will result from the provision of its Financial Products and Financial Services, and how those Financial Products and Financial Services lead to those outcomes.</p>		
<b>Response</b>	Attach narrative		
<b>Response Instruction(s)</b>			
<p><b>If the selection to PM12 is "No,"</b> attach a brief board- or owner-approved narrative that describes the community development outcomes that the Applicant believes will result its eligible Financial Products and/or eligible Financial Services activity and how that activity will lead to those outcomes.</p>			
<p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p>			
<p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>The Applicant’s narrative must include references to:</p> <ul style="list-style-type: none"> <li>• Geographic and/or demographic market served and the needs and/or opportunities with quantitative data or qualitative input from members of that market;</li> <li>• Community development goals and objectives and how the entity plans to achieve them; and</li> <li>• How eligible Financial Products and/or Financial Services and Development Services are expected to improve social or economic conditions in the relevant market.</li> </ul>			

Field	PM12.5	Field Type	Picklist
Field Label/Question Text	Indicate how the document(s) demonstrate governing board or owner approval of the Applicant’s community development outcomes narrative.		
Response	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>A. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified that indicates the document was approved by the governing leadership and its approval date.</li> <li>B. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document, but clearly references it, indicates that the document or the governing leadership decision it records was approved by the governing leadership and specifies its approval date.</li> <li>C. Document provides evidence that it was filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.</li> <li>D. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.</li> <li>E. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from</li> </ul>		

Response Instruction(s)	<p>the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.</p>
<p>Select the appropriate response to indicate how the document(s) demonstrates governing leadership approval of the Applicant’s community development outcomes narrative.</p> <p>By governing or managing board or owner approval, the CDFI Fund means governing leadership approval.</p> <p><b><u>The letter response options in the Application form represent each of the following responses which correspond with applicable letter:</u></b></p> <ul style="list-style-type: none"> <li>A. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified that indicates the document was approved by the governing leadership and its approval date.</li> <li>B. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document, but clearly references it, indicates that the document or the governing leadership decision it records was approved by the governing leadership and specifies its approval date.</li> <li>C. Document provides evidence that it was filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.</li> <li>D. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.</li> <li>E. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.</li> </ul>	

### 5.5.3. Applicant – Primary Mission – Responsible Financing Practices

To meet the CDFI Certification Primary Mission standards for responsible financing practices, an entity seeking to obtain or maintain CDFI Certification should provide Financial Products and Financial Services that are consistent with promoting community development. Such Financial Products should not harm

consumers, be affordable, be originated based upon an assessment of whether a borrower can pay back a loan and have terms and conditions that are transparent and understandable to the borrower. Entities seeking to obtain or maintain CDFI should practice transparency, fair collections, and compliance with federal, State, and local laws and regulations. The CDFI Fund also considers the safety, affordability, and transparency of an entity’s Financial Services to be an important aspect of its commitment to community development.

The CDFI Certification Application asks a series of questions related to eligible Financial Products and eligible Financial Services activity engaged in by the entity seeking to obtain or maintain CDFI Certification (and by each of its Affiliates or other entities relevant to its CDFI Certification review) to determine whether that activity is consistent with the responsible financing principles and with a commitment to community development. These questions apply to *all* eligible Financial Products and eligible Financial Services activity engaged in by an Applicant and each of its Affiliates or other entities relevant to its CDFI Certification review, not only those directed to an allowable Target Market component(s).

**Applicant - Responsible Financing Practices – (PM) Data Fields**

Field	PM13	Field Type	Picklist
Field Label/Question Text	Has the CDFI Fund provided the Applicant with documentation of any amended standards for responsible financing practices applicable to the Applicant’s own financing practices for the purpose of CDFI Certification?		
Response	Yes or No		
Response Instruction(s)			
Select the appropriate response to indicate whether the CDFI Fund provided the Applicant with documentation of any amended standards for responsible financing practices applicable to the Applicant’s own financing practices for the purpose of CDFI Certification. Select “No” if the Applicant has not requested determination of an amended responsible lending standard.			
<i>Questions <b>PM14 through PM22</b> will be asked of Applicants that offer loan products (including credit cards or purchased loans) only.</i>			
Field	PM14	Field Type	Picklist
Field Label/Question Text	Do the Applicant’s underwriting standards for each of its covered mortgage, consumer, and/or small business loan products include an assessment of the borrower’s ability to pay back the loan according to the terms of the loan, meet any of the borrower’s other major financial obligations, and still pay basic expenses without having to reborrow or refinance (except for any final mortgage balloon payment)?		

<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage, consumer, or small business loan products).
<b>Response Instruction(s)</b>	
<p>Select the appropriate response to indicate whether the Applicant’s underwriting standards for each of its covered mortgage, consumer, and/or small business loan products include an assessment of the borrower’s ability to pay back the loan according to the terms of the loan, meet any of the borrower’s other major financial obligations, and still pay basic expenses without having to reborrow or refinance (except for any final mortgage balloon payment).</p> <p>The Applicant should respond as it pertains to all consumer and small business loans; however, there are some exclusions for mortgage loans.</p> <p><u>For purposes of this question (PM14), a covered mortgage loan product is limited to a consumer credit transaction that is secured by a lien on a single-family, owner-occupied residence <i>other than</i>:</u></p> <ul style="list-style-type: none"> <li>(i) A reverse mortgage subject to 12 CFR 1026.33;</li> <li>(ii) A temporary or “bridge” loan with a term of 12 months or less, such as a loan to finance the purchase of a new dwelling where the consumer plans to sell a current dwelling within 12 months or a loan to finance the initial construction of a dwelling;</li> <li>(iii) A construction phase of 12 months or less of a construction-to-permanent loan;</li> <li>(iv) An extension of credit made pursuant to a program administered by a Housing Finance Agency, as defined under 24 CFR 266.5;</li> <li>(v) An extension of credit made pursuant to a program administered by the U.S. Department of Housing and Urban Development, the U.S. Department of Veterans Affairs, or the U.S. Department of Agriculture;</li> <li>(vi) A transaction that does not require payment of interest; or</li> </ul> <p>A transaction made for the purpose of foreclosure avoidance or prevention.</p> <p>Applicants are not required to use the ability to repay standards and metrics established by the CFPB to demonstrate they have underwritten a consumer, mortgage, and/or small business loan to ensure the borrower has the ability to pay back that loan.</p> <p>CDFIs are exempted from CFPB’s Ability to Repay/Qualified Mortgage (ATR/QM) rule (12 CFR § 1026.43) and the CDFI Fund does not require Applicants for Certification to meet the specific ATR requirements prescribed by the rule. However, for the purposes of CDFI Certification, the CDFI Fund regards the consideration of a borrower’s ability to pay back a loan a basic principle of responsible financing practices. The CDFI Fund also notes that regulated entities already are subject to prudential standards that require the consideration of a borrower’s ability to repay a loan.<sup>10</sup></p>	

<sup>10</sup> See, for example, the FDIC’s Interagency Guidelines Establishing Standards for Safety and Soundness (12 CFR Appendix A to Part 364, Title 12), which state in part that “An institution should establish and maintain loan documentation practices that... [i]dentify the purpose of a loan and the source of repayment, and assess the ability of the borrower to repay the indebtedness in a timely manner” (12 CFR Appendix-A-to-Part-364 C.2). The guidelines similarly state that the institution also “should establish and maintain prudent credit underwriting practices that [p]rovide for consideration, prior to credit commitment, of the borrower’s overall financial condition and resources, the financial responsibility of any guarantor, the nature and value of any underlying collateral, and the borrower’s character and willingness to repay as agreed” (12 CFR Appendix-A-to-Part-364 D.3).

The CDFI Fund’s Certification standards for responsible financing practices do not dictate how an Applicant underwrites its loans to determine a borrower’s ability to pay back a loan. An Applicant that does not use the underwriting standards prescribed by CFPB may still meet the standard for Certification through alternative underwriting approaches that considers a borrower’s ability to pay back a loan including, for example, the use of qualitative compensating factors, alternative data (such as a cash flow analysis based on deposit account activity or rent payment history), or alternative or more inclusive credit models (including higher debt to income ratios).

If an Applicant does not consider a borrower’s ability to pay back a loan for any of its covered mortgages, consumer or small business loan products, it may offer an explanation of how this otherwise ineligible practice serves a community development purpose and is consistent with a community development mission.

***If PM14 is “No”, PM14.1 will become visible for the Applicant***

Field	PM14.1	Field Type	Narrative
Field Label/Question Text	If “No,” please explain how the absence of consideration of whether the borrower is able to pay back each type of loan serves a community development purpose.		
Response	Provide narrative		

**Response Instruction(s)**

**If “No” to PM14**, the Applicant must explain how the absence of consideration of whether the borrower is able to pay back each type of loan serves a community development purpose.

An Applicant that does not originate based upon an assessment of whether a borrower is able to pay back a loan may be determined ineligible for CDFI Certification.

**[CLARIFYING UPDATE 07/05/2025]**

Applicant’s narrative must include references to:

- Geographic and/or demographic market served and the needs and/or opportunities with quantitative data or qualitative input from members of that market;
- Community development goals and objectives and how the entity plans to achieve them;
- How eligible Financial Products and/or Financial Services and Development Services are expected to improve social or economic conditions in the relevant market.

The narrative should also include supporting examples, including but not limited to:

- Loan product rates, terms, and conditions;
- Protections that mitigate potential consumer harm of the loan product such as those that ensure borrower affordability and successful repayment of principal, interest, and fees in a reasonable time frame without encouraging reborrowing, rollovers, or immediate collection in the event of default.
- Evidence that consumers are not harmed (e.g., the rate of successful repayments under the original rates, terms, and conditions of the product).

<ul style="list-style-type: none"> <li>Evidence that the credit risk of the loan product is retained by the applicant or transferred (e.g., through sale of the loan product).</li> </ul>			
<p><i>Only for Applicants that originate, purchase interests in, offer, arrange, market, or service any consumer loan products (including credit cards or purchased loans) that allow for an annual percentage rate in excess of 36% when that rate is calculated using the MAPR standard.</i></p>			
<b>Field</b>	<b>PM15</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant originate, purchase interests in, offer, arrange, market, or service any consumer loan products (including credit cards and purchased loans) that allow for an annual percentage rate in excess of 36% when that rate is calculated using the Military Annual Percentage Rate standard <sup>11</sup> ?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer consumer loan products).		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the Applicant originates, purchases interests in, offers, arranges, markets, or services any consumer loan products (including credit cards and purchased loans) that allow for an APR in excess of 36% when that rate is calculated using the Military Annual Percentage Rate standard.</p> <p><b>If “Yes,”</b> the Applicant will be required to respond to additional financing-practices questions about the consumer loan products that allow for an APR in excess of 36% when that rate is calculated using the MAPR standard.</p>			
<p><i>If PM15 is “Yes”, PM15.1 through PM15.7 will become visible for the Applicant</i></p>			
<b>Field</b>	<b>PM15.1</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	<p><b>If “Yes”:</b> What is the current highest allowable MAPR charged on any of the Applicant’s consumer loans (including credit cards and purchased loans)?</p>		
<b>Response</b>	Enter the highest allowable MAPR on any of the Applicant’s consumer loan products.		

<sup>11</sup> For additional guidance on calculating the MAPR, see the CFPB’s Military Lending Act (MLA), Interagency Examination Procedures—2015 Amendments, Terms of Consumer Credit Extended to Covered Borrowers (Calculation of MAPR), 32 CFR 232.4, pp. 6-9.

Response Instruction(s)			
<p>If <b>“Yes”</b> to <b>PM15</b>, enter the highest allowable MAPR on any of the Applicant’s consumer loan products (including credit cards and purchased loans).</p>			
<p>Questions <b>PM15.2 through PM15.7</b> – For any consumer loan product with an MAPR in excess of 36%:</p>			
Field	PM15.2	Field Type	Picklist
Field Label/Question Text	<p>Did any of the consumer loan products in question have an annual default rate over 5% during the 12 full months immediately prior to submission of the Application?<sup>12</sup></p>		
Response	<p>Yes or No</p>		
Response Instruction(s)			
<p>Select the appropriate response to determine whether any of the consumer loan products with an MAPR in excess of 36% had an annual default rate over 5% during the 12 full months immediately prior to submission of the Application.  <b>If “Yes,”</b> the Applicant is not eligible for CDFI Certification.</p>			
Field	PM15.3	Field Type	Picklist
Field Label/ Question Text	<p>Do any of the consumer loans in question include a leveraged payment mechanism?<sup>13</sup></p>		
Response	<p>Yes or No</p>		
Response Instruction(s)			
<p>Select the appropriate response to determine whether any of the consumer loans in question include a leveraged payment mechanism.  <b>If “Yes,”</b> the Applicant is not eligible for CDFI Certification.</p>			
Field	PM15.4	Field Type	Picklist
Field Label/ Question Text	<p>If the product in question includes loans of \$1,000 or less, have the repayment timeframes been limited to no more than 12 months?</p>		

<sup>12</sup> Calculate on a per borrower basis for single payment loans.

<sup>13</sup> The CDFI Fund will rely on the CFPB’s definition of a leveraged payment mechanism: “A loan has a leveraged payment mechanism if the lender or a service provider has the right to initiate a transfer of money, through any means, from a consumer’s account to satisfy an obligation on a loan.” See CFPB final rule and interpretations, Payday, Vehicle Title, and Certain High-Cost Installment Loans, 12 CFR 1041.3(c).

<b>Response</b>	Yes, No, or N/A (i.e., does not offer loans of \$1,000 or less)		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate if the product in question includes loans of \$1,000 or less. Have the repayment timeframes been limited to no more than 12 months? <b>If “No,”</b> the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM15.5</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	For a period of 12 full months after the issuance of such a consumer loan, does the Applicant waive any upfront fees for any refinance or new loan issued to the same borrower?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether for a period of 12 full months after the issuance of such a consumer loan, the Applicant waives any upfront fees for any refinance or new loan issued to the same borrower. <b>If “No,”</b> the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM15.6</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Are all fees spread evenly over the life of the loan and pro rata refundable in the event of early repayment (including through a refinance) for each of the Applicant’s consumer installment loan products in question?		
<b>Response</b>	Yes or No, or N/A (i.e., does not offer consumer installment loan products with an MAPR in excess of 36%).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether all fees spread evenly over the life of the loan and pro rata refundable in the event of early repayment (including through a refinance) for each of the Applicant’s consumer installment loan products in question. <b>If “No,”</b> the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM15.7</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Are all loan payments substantially equal, and do they amortize smoothly to a zero balance by the end of the loan term for each of the Applicant’s consumer installment loan products in question?		

<b>Response</b>	Yes or No, or N/A (i.e., does not offer consumer installment loan products with an MAPR in excess of 36%).		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether all loan payments substantially equal and amortize smoothly to a zero balance by the end of the loan term for each of the Applicant’s consumer installment loan products in question.</p> <p><b>If “No,”</b> the Applicant is not eligible for CDFI Certification.</p>			
<b>Field</b>	<b>PM16</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant originate, purchase interests in, offer, arrange, market, or service small business loan products (including credit cards and purchased loans) that allow for an annual percentage rate in excess of 36%?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer small business loan products).		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the Applicant originates, purchase interests in, offer, arrange, market, or service small business loan products (including credit cards and purchased loans) that allow for an APR in excess of 36%.</p> <p><b>If “Yes,”</b> the Applicant will be required to respond to additional financing-practices questions about the small business loan products that allow for an APR in excess of 36%.</p>			
<p><b>If “Yes,”</b> Only for Applicants that originate, purchase interests in, offer, arrange, market, or service any small business loan products (including credit cards or purchased loans) that allow for an APR in excess of 36%.</p> <p><b>If PM16 is “Yes”, PM16.1 through PM16.6 will become visible for the Applicant.</b></p>			
<b>Field</b>	<b>PM16.1</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	What is the current highest allowable APR charged on any of the Applicant’s small business loans (including credit cards and purchased loans)?		
<b>Response</b>	Enter the highest allowable APR on any of the Applicant’s small business loan products.		
<b>Response Instruction(s)</b>			
Enter the highest allowable APR charged on any of the Applicant’s small business loans (including credit cards and purchased loans).			

Questions <b>PM16.2 through PM16.6</b> – For any small business loan product with an APR in excess of 36%:			
<b>Field</b>	<b>PM16.2</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Did any of the small business loan products in question have an annual default rate over 5% during the 12 full months immediately prior to submission of the Application? <sup>14</sup>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether any of the small business loan products in question have an annual default rate over 5% during the 12 full months immediately prior to submission of the Application.			
<b>Field</b>	<b>PM16.3</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Do any of the small business loans in question include a leveraged payment mechanism? <sup>15</sup>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether any of the small business loans in question include a leveraged payment mechanism.			
<b>Field</b>	<b>PM16.4</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Are all fees spread evenly over the life of the loan and pro rata refundable in the event of early repayment (including through a refinance) for each of the Applicant’s small business installment loan products in question?		
<b>Response</b>	Yes or No, or N/A (i.e., does not offer small business installment loan products with an APR in excess of 36%).		

<sup>14</sup> Calculate on a per borrower basis for single payment loans.

<sup>15</sup> The CDFI Fund will rely on the CFPB’s definition of a leveraged payment mechanism: “A loan has a leveraged payment mechanism if the lender or a service provider has the right to initiate a transfer of money, through any means, from a consumer’s account to satisfy an obligation on a loan.” See CFPB final rule and interpretations, Payday, Vehicle Title, and Certain High-Cost Installment Loans, 12 CFR 1041.3(c).

Response Instruction(s)			
Select the appropriate response to indicate whether all fees are spread evenly over the life of the loan and are pro rata refundable in the event of early repayment (including through a refinance) for each of the Applicant’s small business installment loan products in question.			
Field	PM16.5	Field Type	Picklist
Field Label/Question Text	Are all installment loan payments substantially equal, and do they amortize smoothly to a zero balance by the end of the loan term for each of the Applicant’s small business installment loan products in question?		
Response	Yes or No, or N/A (i.e., does not offer small business installment loan products with an APR in excess of 36%).		
Response Instruction(s)			
Select the appropriate response to indicate whether all installment loan payments are substantially equal amortize smoothly to a zero balance by the end of the loan term for each of the Applicant’s small business installment loan products in question.			
<b>[CLARIFYING UPDATE 07/05/2025]</b>			
An Applicant’s narrative must include references to:			
<ul style="list-style-type: none"> <li>• Geographic and/or demographic market served and the needs and/or opportunities with quantitative data or qualitative input from members of that market;</li> <li>• Community development goals and objectives and how the entity plans to achieve them</li> <li>• How eligible Financial Products and/or Financial Services and Development Services are expected to improve social or economic conditions in the relevant market.</li> </ul>			
Field	PM16.6	Field Type	Text
Field Label/Question Text	If the Applicant responded “Yes” to either PM16.2 or PM16.3 or responded “No” to either PM16.4 or PM16.5, describe why the small business loan product should be considered consistent with an acceptable community development mission.		
Response	Provide narrative		
Response Instruction(s)			
An Applicant that offers a small business loan product with an APR in excess of 36% <i>and</i> responded “Yes” to either question PM16.2 or PM16.3 or responded “No” to either PM16.4 or PM16.5 may be determined ineligible for CDFI Certification.			

<b>PM17</b> For each of the Applicant’s small business loan products, does the Applicant disclose in writing. <sup>16</sup>			
<b>Field</b>	<b>PM17.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	The periodic payment due?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer small business loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant discloses the period payment due in writing for each small business loan product it offers.			
<b>Field</b>	<b>PM17.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	The total amount to be repaid over the life of the loan?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer small business loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant discloses the total amount to be repaid over the life of the loan for each small business loan product it offers.			
<b>Field</b>	<b>PM17.3</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	The total finance charges over the life of the loan?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer small business loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant discloses the total finance charges over the life of the loan for each small business loan product it offers.			
<b>Field</b>	<b>PM17.4</b>	<b>Field Type</b>	Picklist.
<b>Field Label/ Question Text</b>	The annual percentage rate of the loan?		

<sup>16</sup> Beginning January 1, 2026, new Applicants that offer small business loan products that do not disclose, in writing, the periodic payment due, the total amount to be repaid over the life of the loan, the total finance charges over the life of the loan, or the APR of the loan will be ineligible for CDFI Certification. Certified CDFIs that offer small business loan products will be required to attest in their ACR to making such disclosures no later than October 1, 2026, in order to maintain their Certification.

<b>Response</b>		Yes, No, or N/A (i.e., does not offer small business loan products).	
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant discloses the annual percentage rate of the loan for each small business loan product it offers.			
<b>Field</b>	<b>PM18</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	If the Applicant is a non-depository institution, does the Applicant originate, purchase interests in, offer, arrange, market, or service loans that exceed the interest limits that apply to non-depository institutions in the state where the borrower resides?		
<b>Response</b>	Yes, No, or N/A (i.e., Affiliate is a depository institution).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the non-depository institution Applicant originates, purchases interests in, offers, arranges, markets, or services loans that exceed the interest limits that apply to non-depository institutions in the State where the borrower resides. Select "N/A (i.e., Affiliate is a depository institution)" if Applicant is a depository institution. <b>If "Yes,"</b> the Applicant is not eligible for CDFI Certification.			
<p><b>PM19</b> For purposes of this question, <b>PM19</b>, a covered mortgage loan product is limited to a consumer credit transaction that is secured by a lien on a single-family, owner-occupied residence <i>other than</i>:</p> <p>Transactions secured by a subordinate lien;</p> <ul style="list-style-type: none"> <li>(i) A reverse mortgage subject to 12 CFR 1026.33;</li> <li>(ii) A temporary or "bridge" loan with a term of 12 months or less, such as a loan to finance the purchase of a new dwelling where the consumer plans to sell a current dwelling within 12 months or a loan to finance the initial construction of a dwelling;</li> <li>(iii) A construction phase of 12 months or less of a construction-to-permanent loan;</li> <li>(iv) An extension of credit made pursuant to a program administered by a Housing Finance Agency, as defined under 24 CFR 266.5;</li> <li>(v) An extension of credit made pursuant to a program administered by the U.S. Department of Housing and Urban Development, the U.S. Department of Veterans Affairs, or the U.S. Department of Agriculture;</li> <li>(vi) A transaction that does not require payment of interest;</li> <li>(vii) A transaction made for the purpose of foreclosure avoidance or prevention; or</li> <li>(viii) For PM19.2 (loans with interest-only payments) and PM19.3 (loans with balloon payments) only, a transaction with a payment schedule that is adjusted to the seasonal or irregular income of the consumer.</li> </ul>			

<i>For each of the Applicant's covered mortgage loan products, does the Applicant:</i>			
<b>Field</b>	<b>PM19.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Offer covered mortgage loans that include negative amortization?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant engages in any covered mortgage loan activity that allows negative amortization. If <b>"Yes,"</b> the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM19.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Offer covered mortgage loans that include interest-only payments?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant engages in any covered mortgage loan activity that allows interest-only payments. If <b>"Yes,"</b> the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM19.3</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Offer covered mortgage loans that include balloon payments? <sup>17</sup>		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant engages in any covered mortgage loan activity that allows balloon payments.			
<i>If <b>"Yes,"</b> respond to questions <b>PM19.3a – PM19.3d</b></i>			
<b>Field</b>	<b>PM19.3a</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Do the covered mortgage loans meet the criteria set forth in 12 CFR 1026.43(f)(1)(i)-(vi)?		

<sup>17</sup> A balloon payment is a payment that is more than two times a regular periodic payment.

<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>If <b>“Yes” to PM 19.3</b>, select the appropriate response to indicate whether the Applicant’s covered mortgage loan activity that involves balloon payments meets the criteria set forth in 12 CFR 1026.43(f)(1)(i)-(vi).</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>If the Applicant responds “Yes” to each of the questions PM19.3a through PM19.3c, it will be determined to meet the relevant standard for responsible financing practices.</p> <p>If the Applicant responds “No” to any of the questions PM19.3a through PM19.3c, in order to demonstrate eligibility, it must describe in PM19.3d how such loans are advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</p>			
<b>Field</b>	<b>PM19.3b</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	If the Applicant renews the loan when the balloon payment is due, does the new loan retain the original amortization period?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>If <b>“Yes” to PM 19.3</b>, select the appropriate response to indicate whether, if the Applicant renews a covered mortgage loan that includes a balloon payment when the balloon payment is due, the new loan retains the original amortization period.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>If the Applicant responds “Yes” to each of the questions PM19.3a through PM19.3c, it will be determined to meet the relevant standard for responsible financing practices.</p> <p>If the Applicant responds “No” to any of the questions PM19.3a through PM19.3c, in order to demonstrate eligibility, it must describe in PM19.3d how such loans are advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</p>			
<b>Field</b>	<b>PM19.3c</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	If the Applicant renews the loan when the balloon payment is due, does the Applicant (as permitted by regulation) waive the need for a new appraisal and limit application and origination fees?		
<b>Response</b>	Yes or No		

Response Instruction(s)			
<p>If <b>“Yes” to PM 19.3</b>, select the appropriate response to indicate whether, if the Applicant renews a covered mortgage loan that includes a balloon payment when the balloon payment is due, it (as permitted by regulation) waives the need for a new appraisal and limit application and origination fees.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>If the Applicant responds “Yes” to each of the questions PM19.3a through PM19.3c, it will be determined to meet the relevant standard for responsible financing practices.</p> <p>If the Applicant responds “No” to any of the questions PM19.3a through PM19.3c, in order to demonstrate eligibility, it must describe in PM19.3d how such loans are advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</p>			
Field	PM19.3d	Field Type	Text
Field Label/ Question Text	<p>If the Applicant responded <b>“No”</b> to any of the questions PM19.3a through PM19.3c, please describe how such loans are advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</p>		
Response	<p>Provide narrative</p>		
Response Instruction(s)			
<p>If <b>“Yes” to PM 19.3 and if “No” was selected in PM19.3a, PM19.3b, or PM19.3c</b>, fully describe how such loans are advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</p> <p>An Applicant that offers covered mortgage loan products that include balloon payments and that responded <b>“No” to any of the questions PM19.3a through PM19.3c</b> may be determined to be ineligible for CDFI Certification.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>If the Applicant responds “No” to any of the questions PM19.3a through PM19.3c, in order to demonstrate eligibility, it must describe in PM19.3d how such loans are advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</p> <p>An Applicant’s narrative must include references to:</p> <ul style="list-style-type: none"> <li>• Geographic and/or demographic market served and the needs and/or opportunities with quantitative data or qualitative input from members of that market;</li> <li>• Community development goals and objectives and how the entity plans to achieve them</li> <li>• How eligible Financial Products and/or Financial Services and Development Services are expected to improve social or economic conditions in the relevant market.</li> </ul>			

The narrative should also include supporting examples, including but not limited to:

- Loan product rates, terms, and conditions;
- Protections that mitigate potential consumer harm of the loan product such as those that ensure borrower affordability and successful repayment of principal, interest, and fees in a reasonable time frame without encouraging reborrowing, rollovers, or immediate collection in the event of default.
- Evidence that consumers are not harmed (e.g., the rate of successful repayments under the original rates, terms, and conditions of the product).
- Evidence that the credit risk of the loan product is retained by the applicant or transferred (e.g., through sale of the loan product).

In addition:

- If the Applicant responded “No” to PM19.3a, in addition to the community development purpose of the covered mortgage loan product, it should explain in its narrative which criteria from 12CFR§§ 1026.43(f)(1)(i)(vi) it does not meet;
- If the Applicant responded “No” to PM19.3b, it should clarify: (1) how it helps borrowers refinance their mortgage with another lender at reasonable rates and terms if it does not renew the loan when the balloon payment is due, or how it ensures borrowers can make the balloon payment without having to sell their home; or (2) if it does renew the covered mortgage but does not retain the original amortization period, it should explain why and how it assists the borrower in building equity.
- If the Applicant responded “No” to PM19.3c, it should explain (1) how it assists borrowers in refinancing their mortgage with another lender at reasonable rates and terms if it does not renew the covered mortgage loan when the balloon payment is due, or how it ensures borrowers can make the balloon payment without selling their home; or (2) if it renews the loans, but does not waive the need for a new appraisal or limit application or origination fees as allowed by regulation, it should explain why and how it minimized refinancing cost of the borrower.

<b>Field</b>	<b>PM19.4</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Underwrite adjustable rate covered mortgages at less than the maximum rate in the first five years?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant underwrites adjustable rate covered mortgages at less than the maximum rate in the first five years. If “Yes,” the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM19.5</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Offer covered mortgage loans with an original maximum term longer than 30 years?		

<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant offers covered mortgage loans with an original maximum term longer than 30 years.			
<i>If “Yes,” PM19.5a will become visible for the Applicant.</i>			
<b>Field</b>	<b>PM19.5a</b>	<b>Field Type</b>	<b>Text</b>
<b>Field Label/ Question Text</b>	If “Yes,” for any covered mortgage loans with an original term longer than 30 years, what is the maximum term allowable, and describe why the loan should be considered consistent with an acceptable community development mission.		
<b>Response</b>	Provide narrative		
<b>Response Instruction(s)</b>			
<p><b>If “Yes” was selected in PM19.5,</b> for identify the maximum term allowable and fully describe why any covered mortgage loans with an original term of 30 years should be considered consistent with an acceptable community development mission.</p> <p>An Applicant that offers covered mortgage loan products with an original maximum term longer than 30 years may be determined to be ineligible for CDFI Certification.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>An Applicant’s narrative must include references to:</p> <ul style="list-style-type: none"> <li>• Geographic and/or demographic market served and the needs and/or opportunities with quantitative data or qualitative input from members of that market;</li> <li>• Community development goals and objectives and how the entity plans to achieve them</li> <li>• How eligible Financial Products and/or Financial Services and Development Services are expected to improve social or economic conditions in the relevant market.</li> </ul> <p>The narrative should also include supporting examples, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Loan product rates, terms, and conditions;</li> <li>• Protections that mitigate potential consumer harm of the loan product such as those that ensure borrower affordability and successful repayment of principal, interest, and fees in a reasonable time frame without encouraging reborrowing, rollovers, or immediate collection in the event of default.</li> <li>• Evidence that consumers are not harmed (e.g., the rate of successful repayments under the original rates, terms, and conditions of the product).</li> <li>• Evidence that the credit risk of the loan product is retained by the applicant or transferred (e.g., through sale of the loan product).</li> </ul>			

<b>Field</b>	<b>PM19.6</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/ Question Text</b>	Verify the income or assets of the borrower of a covered mortgage loan product?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the Applicant verifies the income or assets of the borrower of a covered mortgage loan.</p> <p><b>If “No,”</b> the Applicant is not eligible for CDFI Certification.</p> <p>For purposes of CDFI Certification eligibility, an Applicant that offers covered mortgage loan products must verify the borrower’s income or assets using third party records that provide reasonably reliable evidence of the borrower’s income or assets. The Applicant may verify the consumer’s income using a tax-return transcript issued by the Internal Revenue Service (IRS). As described in 12 CFR 1026.43(c)(4), examples of other records the Applicant may use to verify the consumer’s income or assets include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Copies of tax returns the consumer filed with the IRS or a State taxing authority;</li> <li>• IRS Form W-2s or similar IRS forms used for reporting wages or tax withholding;</li> <li>• Payroll statements, including military Leave and Earnings Statements;</li> <li>• Financial institution records;</li> <li>• Records from the consumer’s employer or a third party that obtained information from the employer; Records from a Federal, State, or local government agency stating the consumer’s income from benefits or entitlements;</li> <li>• Receipts from the consumer’s use of check cashing services; and</li> <li>• Receipts from the consumer’s use of a funds transfer service.</li> </ul>			
<b>Field</b>	<b>PM19.7</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/ Question Text</b>	Charge upfront points and fees on a covered mortgage loan product in excess of the Qualified Mortgage limits?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the Applicant charges upfront points and fees on a covered mortgage loan product in excess of the Qualified Mortgage Limits.</p> <p>The Qualified Mortgage limits on upfront points and fees are adjusted annually for inflation on January 1.</p> <p>See § 1026.43(e)(3) and Comment 43(e)(3)(ii)-1 for the annual limits.</p> <p><b>If “Yes,”</b> the Applicant is not eligible for CDFI Certification.</p>			
<b>Field</b>	<b>PM20</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/ Question Text</b>	Select the tools the Applicant uses to assist struggling borrowers.		

<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>Fees or interest waivers.</li> <li>Interest rate reductions.</li> <li>Loan term extensions.</li> <li>Principal forbearance.</li> <li>Principal forgiveness.</li> <li>Other.</li> <li>None.</li> <li>N/A-Entity does not engage in any eligible Financial Product activity.</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response(s) to indicate the tool(s) the Applicant uses to assist struggling borrowers.			
<i>If PM20 is "Other", PM20.1 will become visible for the Applicant</i>			
<b>Field</b>	<b>PM20.1</b>	<b>Field Type</b>	Text
<b>Field Label/ Question Text</b>	If "Other," please describe.		
<b>Response</b>	Provide description.		
If "Other" was selected in PM20, describe the "other" tool(s) the Applicant uses to assist struggling borrowers.			
<b>Field</b>	<b>PM21</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Does the Applicant sell its charged-off consumer or small business debt to debt buyers?		
<b>Response</b>	Yes, No, or N/A-Entity does not engage in any eligible Financial Product activity.		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant sells its charged-off consumer or small business debt to debt buyers.			
If "Yes," the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM22</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	If the Applicant is an FDIC-insured depository institution, does the Applicant have a current Community Reinvestment Act rating of Satisfactory or higher?		

<b>Response</b>	Yes, No, or N/A (i.e., not an FDIC-insured depository institution).		
<b>Response Instruction(s)</b>			
For FDIC-insured depository institutions, select the appropriate response to indicate whether the current Community Reinvestment Act rating is Satisfactory or higher. <b>If “No,”</b> the Applicant is not eligible for CDFI Certification.			
<i>PM23 and PM24 will be asked <b>only</b> of entities that offer Equity Investment Financial Products.</i>			
<b>Field</b>	<b>PM23</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant have a policy or practice in place for its Equity Investment Financial Products that prevents the Applicant from gaining Control over an investee, except if the Applicant must save a business through ownership as a last resort for a limited period of time?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer equity products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant has a policy or practice in place for its Equity Investment Financial Products that prevents it from gaining Control over an investee except if it must save the relevant business through ownership as a last resort and only for a limited period of time. <b>If “No,”</b> the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM24</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	During the 12 full months completed immediately prior to submission of the Application, did the Applicant leverage, for its own benefit, the assets of any of its active investees?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer equity products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant leveraged the assets of any of its active investees for its own benefit during the 12 full calendar months completed immediately prior to submission of the CDFI Certification Application. <b>If “Yes,”</b> the Applicant is not eligible for CDFI Certification.			

### 5.5.4. Applicant – Primary Mission – Responsible Financing Practices – Financial Services

#### **Applicant - Responsible Financing Practices – Financial Services - (PM) Data Fields**

<i>PM25 through PM27 will be asked only for Depository Institutions (Regulated Institutions.)</i>			
Field	PM25	Field Type	Picklist
Field Label/Question Text	Select each of the listed features associated with a <i>single</i> checking or share account (including checkless checking) offered by the Applicant (i.e., only select the features that are offered as part of the same account; if other features are offered by the Applicant in different accounts, do not include).		
Response	Select all that apply: <ul style="list-style-type: none"> <li>Free access to debit card network for point of sale and bill payment</li> <li>Minimum opening deposit of \$25 or less</li> <li>Monthly maintenance fee of \$5 or less if not waivable, or \$10 or less if waivable.<sup>18</sup></li> <li>No overdraft or nonsufficient funds fees.<sup>19</sup></li> <li>No account activation, closure, dormancy, inactivity, or low-balance fees.</li> <li>Free and unrestricted branch access <i>or</i> (for Applicants without branches) access to free ATM network and free remote deposits.</li> <li>Free and unrestricted telephone banking (including live support).</li> <li>Free and unrestricted in-network ATM access.</li> <li>Out-of-network ATM fee of \$2.50 or less, or up to \$3.00 if free access to a partner ATM network is also provided.</li> <li>Free deposit capability for cash and checks in-branch and at ATM (when available) and direct deposit.</li> <li>Free bill pay if available or at least four free money orders and/or cashier checks per month.</li> <li>Free check cashing for checks issued by the Applicant.</li> <li>Free online banking, mobile banking, and banking alerts (if offered).</li> </ul>		

<sup>18</sup> For monthly maintenance fee to be considered waivable, the Applicant must offer at least two options to waive the fee entirely with a single transaction (e.g., direct deposit with no minimum deposit, online bill pay, or debit card purchase).

<sup>19</sup> An overdraft fee is a fee or charge on a consumer's account held by the institution for paying a transaction (including a check or other item) when the consumer's account has insufficient or unavailable funds. A nonsufficient funds fee is a fee or charge on a consumer's account held by the institution for a transaction (including a check or other item) returned unpaid when the consumer's account has insufficient or unavailable funds.

	<ul style="list-style-type: none"> <li>• Free electronic monthly statements, or \$2 or less for mailed paper statements (if offered).</li> <li>• Account screening – only denying new customers for past incidences of actual fraud.</li> <li>• Alternative ID(s) (e.g., municipal, consular) accepted.</li> <li>• Free linked savings accounts and account transfers.</li> <li>• Money orders priced at the U.S. Postal Service rate or less.</li> <li>• Competitively priced remittances (international wire).</li> <li>• Credit-building product offerings such as secured credit card or secured personal loan available.</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response(s) to identify the feature(s) associated with a <i>single</i> checking or savings account (including checkless checking) offered by the Applicant (i.e., only select the features that are offered as part of the same account; if other features are offered by the Applicant in different accounts, do not include them in this response.</p> <p>While the term share account was used in the question/label for this field, the CDFI Fund meant to refer to savings account.</p>			
<b>Field</b>	<b>PM25.1</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Identify the checking or share account that includes each of the selected features.		
<b>Response</b>	Name account		
<b>Response Instruction(s)</b>			
Enter the name of the checking or share account that includes each of the selected features identified in PM25.			
<b>Field</b>	<b>PM26</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	For any of the Applicant’s depository accounts, is the account holder subject to any potential overdraft fees?		
<b>Response</b>	Yes, No, or N/A-Entity does not engage in any eligible Financial Services activity.		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether, for any of the Applicant’s depository accounts, the account holder is subject to any potential overdraft fee.			

<b>If “Yes” respond to questions PM26.1 through PM26.6.</b>			
<b>Field</b>	<b>PM26.1</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Specify the highest dollar amount charged for such a fee.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
If “Yes” to PM26, enter the highest dollar amount that might be charged for any overdraft fee.			
<b>Field</b>	<b>PM26.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Can such fees exceed the amount of the item being cleared?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
If “Yes” to PM26, select the appropriate response to indicate whether any potential overdraft fee might exceed the amount of the item being cleared.			
<b>Field</b>	<b>PM26.2a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Describe why such fees should be considered reasonable and proportionate to the amount of the item being cleared and consistent with an acceptable community development mission.		
<b>Response</b>	Provide narrative.		
<b>Response Instruction(s)</b>			
<p><b>If “Yes” to PM26.2, fully describe why overdraft fees that exceed the amount of the item being cleared should be considered reasonable and proportionate to the amount of the item being cleared and consistent with an acceptable community development mission.</b></p> <p>An Applicant that charges overdraft fees in excess of the amount of the item being cleared may be determined to be ineligible for CDFI Certification.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>An Applicant should describe how it mitigates the risks associated with automated overdraft payment programs and limits customers’ use of overdraft as a short-term, high-cost credit option. Examples of such actions can be found in the FDIC’s 2010 guidance on “Overdraft Payment Programs and Consumer Protection” (FIL-81-2010), and include, but are not limited to:</p>			

<ul style="list-style-type: none"> <li>Monitoring programs for excessive or chronic customer use and contacting such customers (e.g., in person or via telephone) to discuss less costly alternatives to the automated overdraft payment program such as a linked savings account, a more reasonably priced line of credit consistent with safe and sound banking practices, or a safe and affordable small-dollar loan, and giving the customer a reasonable opportunity to decide whether to continue fee-based overdraft coverage or choose another available alternative;</li> <li>Providing access to free or low-cost financial education workshops or financial counseling for customers with frequent overdraft fees;</li> <li>Honoring requests to opt-out overdraft coverage for non-electronic transactions;</li> <li>Allowing consumers to affirmatively choose the overdraft payment product that best suits their needs;</li> <li>Setting daily limits on overdraft fees (see PM26.3) and not charging overdraft fees for transactions that overdraw an account by a minimum amount (see PM26.2); and</li> <li>Processing transactions to minimize consumer costs.</li> <li>Implement additional consumer protection features such as those listed in PM26.5.</li> </ul>			
<b>Field</b>	<b>PM26.3</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Specify any <i>daily</i> limits on the number and frequency of such fees that can be charged to an account holder.		
<b>Response</b>	Enter number		
<b>Response Instruction(s)</b>			
Identify any <i>daily</i> limits on the number and frequency of the overdraft fees that can be charged to an account holder.			
<b>Field</b>	<b>PM26.4</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Specify any <i>annual</i> limits on the number and frequency of such fees that can be charged to an account holder.		
<b>Response</b>	Enter number		
<b>Response Instruction(s)</b>			
Identify any <i>annual</i> limits on the number and frequency of the overdraft fees that can be charged to an account holder.			
<b>Field</b>	<b>PM26.4a</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	If an account holder may be charged such fees on more than six occasions in a rolling 12-month period, describe why such fees should		

	be considered consistent with an acceptable community development mission.		
<b>Response</b>	Provide narrative.		
<b>Response Instruction(s)</b>			
<p>If an account holder may be charged overdraft fees on more than six occasions in a rolling 12-month period, fully describe why such fees should be considered consistent with an acceptable community development mission.</p> <p>An Applicant that charges overdraft fees on more than six occasions in a rolling 12-month period may be determined to be ineligible for CDFI Certification.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>An Applicant should describe how it mitigates the risks associated with automated overdraft payment programs and limits customers’ use of overdraft as a short-term, high-cost credit option. Examples of such actions can be found in the FDIC’s 2010 guidance on “Overdraft Payment Programs and Consumer Protection” (FIL-81-2010), and include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Monitoring programs for excessive or chronic customer use and contacting such customers (e.g., in person or via telephone) to discuss less costly alternatives to the automated overdraft payment program such as a linked savings account, a more reasonably priced line of credit consistent with safe and sound banking practices, or a safe and affordable small-dollar loan, and giving the customer a reasonable opportunity to decide whether to continue fee-based overdraft coverage or choose another available alternative;</li> <li>• Providing access to free or low-cost financial education workshops or financial counseling for customers with frequent overdraft fees;</li> <li>• Honoring requests to opt-out overdraft coverage for non-electronic transactions;</li> <li>• Allowing consumers to affirmatively choose the overdraft payment product that best suits their needs;</li> <li>• Setting daily limits on overdraft fees (see PM26.3) and not charging overdraft fees for transactions that overdraw an account by a minimum amount (see PM26.2);</li> <li>• Processing transactions to minimize consumer costs; and</li> <li>• Implementing additional consumer protection features such as those listed in PM26.5.</li> </ul>			
<b>Field</b>	<b>PM26.5</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Select each of the listed features included in the Applicant’s overdraft program.		
<b>Response</b>	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• No overdraft fees on debit card purchases.</li> <li>• No overdraft fees on ATM withdrawals.</li> <li>• No extended/sustained overdraft fees.</li> <li>• Grace period provided before charging an overdraft fee.</li> <li>• Negative balances allowed without triggering an overdraft fee.</li> <li>• Balance-related alerts offered.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Access to real-time balance information.</li> <li>• Consumer’s checking account linked to another account for overdraft protection.</li> <li>• Overdraft fees collected from a consumer’s next deposit only after other items have been posted or cleared.</li> <li>• No additional fees charged when an item is re-presented.</li> <li>• No transfer fees on overdraft transfers from savings or from a credit account.</li> <li>• Other.</li> <li>• None.</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response(s) to identify the relevant feature(s) included in the Applicant’s overdraft program.</p> <div style="border: 1px solid black; padding: 5px; background-color: #fff9c4;"> <p><b>NOTE:</b> The picklist options <b>should not include a “None” option</b>. If it does, do not select this option in response to question PM26.5. If “None” is selected, the response <b>will not allow the page to be saved</b>.</p> </div>			
<b>Field</b>	<b>PM26.5a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	<p>If <b>“Other,”</b> describe the feature included in the Applicant’s overdraft program.</p>		
<b>Response</b>	Provide narrative		
<b>Response Instruction(s)</b>			
<p>If <b>“Other”</b> was selected in <b>PM26.5</b>, describe the “other” feature included in the Applicant’s overdraft program.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b>                  An Applicant must convey the eligibility determinations approved by the CDFI Fund via Section Zero.</p>			
<b>Field</b>	<b>PM27</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p>For any of the Applicant’s depository accounts, is the account holder subject to any potential nonsufficient funds (NSF) fees?</p>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether for any of the Applicant’s depository accounts the account holder is subject to any potential nonsufficient funds (NSF) fees.</p>			

<b>If “Yes,” proceed to question PM27.1 through PM27.6</b>			
<b>Field</b>	<b>PM27.1</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Specify the highest dollar amount charged for such a fee.		
<b>Response</b>	Enter number		
<b>Response Instruction(s)</b>			
Enter the highest dollar amount that might be charged for any nonsufficient funds fee.			
<b>Field</b>	<b>PM27.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Can such fees exceed the amount of the item returned unpaid?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether any nonsufficient funds fees might exceed the amount of the item returned unpaid.			
<b>Field</b>	<b>PM27.2a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	<b>If “Yes,”</b> Describe why such fees should be considered reasonable and proportionate to the amount of the item being returned unpaid and consistent with an acceptable community development mission.		
<b>Response</b>	Provide narrative.		
<b>Response Instruction(s)</b>			
<p>Describe why NSF fees in excess of the amount of the item returned unpaid should be considered reasonable and proportionate to the amount of the item being returned unpaid and consistent with an acceptable community development mission.</p> <p>An Applicant that charges NSF fees in excess of the amount of the item returned unpaid may be determined to be ineligible for CDFI Certification.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>Applicants should describe how they mitigate the risks associated with NSF fees and limit their occurrence. Examples effective actions include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Monitoring accounts for excessive NSF fees and contacting affected customers to discuss affordable alternatives such as a linked savings accounts or low-cost loans, safe and affordable small-dollar loans, while allowing customers to choose their options;</li> <li>• Offering free or low-cost financial education workshops or personalized counseling to consumers with excessive or chronic incurrence of NSF fees;</li> </ul>			

<ul style="list-style-type: none"> <li>• Reviewing notification practices related to NSF transactions to help customers avoid multiple fees and restore account balances;</li> <li>• Taking corrective action when NSF fee issues arise, including providing restitution to affected customers, as outlined in the FDIC’s 2022 “Supervisory Guidance on Multiple Re-Presentation NSF Fees” (FIL-40-2022); and</li> <li>• Implementing additional consumer protection features as listed in PM27.6.</li> </ul>			
<b>Field</b>	<b>PM27.3</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Specify any <i>daily</i> limits on the number and frequency of such fees that can be charged to an account holder.		
<b>Response</b>	Enter number		
<b>Response Instruction(s)</b>			
Identify any <i>daily</i> limits on the number and frequency of the NSF fees that can be charged to an account holder.			
<b>Field</b>	<b>PM27.4</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Can such fees be charged more than once for the same transaction, regardless of whether the item is re-presented?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether NSF fees can be charged more than once for the same transaction, regardless of whether the item is re-presented.			
<b>Field</b>	<b>PM27.4a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	<b>If “Yes,”</b> describe why such fees should be considered consistent with an acceptable community development mission.		
<b>Response</b>	Provide narrative		
<b>Response Instruction(s)</b>			
<p><b>If “Yes” to PM27.4,</b> fully describe why charging NSF fees more than once for the same transaction, regardless of whether the item is re-presented, should be considered consistent with an acceptable community development mission.</p> <p>An Applicant that charges NSF fees more than once for the same transaction may be determined to be ineligible for CDFI Certification.</p>			

**[CLARIFYING UPDATE 07/05/2025]**

Applicants should describe how they mitigate the risks associated with NSF fees and limit their occurrence. Examples of effective actions include, but are not limited to:

- Monitoring accounts for excessive NSF fees and contacting affected customers to discuss affordable alternatives such as a linked savings accounts or low-cost loans, safe and affordable small-dollar loans, while allowing customers to choose their options;
- Offering free or low-cost financial education workshops or personalized counseling to consumers with excessive or chronic incurrence of NSF fees;
- Reviewing notification practices related to NSF transactions to help customers avoid multiple fees and restore account balances;
- Taking corrective action when NSF fee issues arise, including providing restitution to affected customers, as outlined in the FDIC’s 2022 “Supervisory Guidance on Multiple Re-Presentment NSF Fees” (FIL-40-2022); and
- Implementing additional consumer protection features as listed in PM27.6.

<b>Field</b>	<b>PM27.5</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Specify any <i>annual</i> limits on the number and frequency of such fees that can be charged to an account holder.		
<b>Response</b>	Enter number		
<b>Response Instruction(s)</b>			
Identify any <i>annual</i> limits on the number and frequency of the NSF fees that can be charged to an account holder.			
<b>Field</b>	<b>PM27.6</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Select each of the listed features included in the Applicant’s NSF policies.		
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• Balance-related alerts offered.</li> <li>• Access to real-time or near real-time balance information provided.</li> <li>• NSF fees collected from a consumer’s next deposit only after other items have been posted or cleared.</li> <li>• Consumer’s checking account linked to another account for NSF protection.</li> <li>• No transfer fees on NSF transfers from savings or from a credit account.</li> <li>• Other.</li> <li>• None.</li> </ul>		

Response Instruction(s)			
Select the appropriate response(s) to identify any feature(s) included in the Applicant’s NSF policies.			
Field	PM27.6a	Field Type	Text
Field Label/Question Text	If “Other,” describe the feature included in the Applicant’s NSF policies		
Response	Provide narrative		
Response Instruction(s)			
If “Other” to PM27.6, describe the “other” feature included in the Applicant’s NSF policies.			

### 5.5.5. Affiliates – Primary Mission – PM28

Affiliates or other entities relevant to the CDFI Certification Primary Mission review (including in connection with the CDFI Certification Collective Review process) are not required to have their own community development strategy. However, Affiliates (and/or other relevant entities) must provide a description of how the mission and activities of each such Affiliate (or other relevant entity) support or are consistent with the community development mission of the entity seeking to obtain or maintain the CDFI Certification.

#### **Affiliates– Primary Mission – (PM28) Data Fields**

<p><i>For each Affiliate or other entity relevant to the review of the Applicant’s compliance with the CDFI Certification Primary Mission requirements (including the collective review requirements), the Applicant must complete the mission documentation and relevant Primary Mission-related responsible financing practices fields.</i></p> <p><i>The following information must also be provided on all Affiliates or other entities relevant to the Applicant’s Primary Mission review.</i></p>			
Field	PM28	Field Type	Text
Field Label/Question Text	Describe the activities of the Affiliate and how the Affiliate’s mission and activities support and/or are consistent with the community development mission of the Applicant.		
Response	Provide description		
Response Instruction(s)			
Provide a description of the activities of the identified Affiliate or other entity to be assessed that meets conditions regarding the Applicant’s CDFI Certification Primary Mission review (including in connection with the CDFI Certification collective review process) and indicate how the relevant			

Affiliate’s/related entity’s mission ***and, separately and distinctly***, how its activities support and/or are consistent with the Applicant’s community development primary mission.

**[CLARIFYING UPDATE 07/05/2025]**

The narrative describing the activities of the identified Affiliate or other entity must include:

- the Affiliate’s geographic service area and/or demographic market and the needs of and/or opportunities in the service area/market, which might include quantitative data or qualitative input from members of that service area/market;
- one or more goals and objectives and/or how the Affiliate intends to meet those goals and objectives;
- how, when applicable, the Affiliate’s Financial Products and Financial Services, Development Services, and/or other activities are expected to meet the goals and objectives previously referenced; and
- the connection between the Affiliate’s activities to the Applicant’s Primary Mission of the promotion of community development.

**Review the following information before completing this field:**

- Primary Mission for entities with an Affiliate(s) and/or Entities Subject to the CDFI Certification Collective Review
- Primary Mission requirements

### 5.5.6. Affiliate – Primary Mission

The Applicant must enter mission information for each Affiliate or other entity relevant to review in connection with any of the CDFI Certification requirements. In order for an Applicant to meet the CDFI Certification Primary Mission requirements, certain Affiliates must demonstrate a governing leadership-approved mission that supports or is consistent with the Applicant’s primary mission of promoting community development.

If an entity seeking to obtain or maintain CDFI Certification has an Affiliate(s) that either Controls it or that engages in eligible Financial Products or eligible Financial Service activity, that Affiliate(s) will also be taken into consideration as part of the Primary Mission review. If the entity seeking to obtain or maintain CDFI Certification is subject to the CDFI Certification collective review, each entity relevant to the collective review process will also be taken into consideration.

<b>NOTE</b>	Affiliates, that are separately Certified CDFIs or Community Development Entities (CDEs) when the CDFI Certification review of the other Affiliate is being conducted, as well as Affiliates whose sole activity is the participation in other federal financing programs, are presumed to meet the CDFI Certification primary mission requirements. Applicant may select “N/A - Affiliate is either a Certified CDFI, Certified CDE, or Solely Engaged in Federal Financing Activity” in the Affiliate – Primary Mission section data-fields of the CDFI Certification Application for any applicable Affiliate relevant to the CDFI Certification review.
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#### **Affiliate - Primary Mission – (PM) Data Fields**

*For each Affiliate or other entity relevant to the review of the Applicant’s compliance with the CDFI Certification Primary Mission requirements (including the collective review requirements), the*

*Applicant must complete the mission documentation and relevant Primary Mission-related responsible financing practices fields.*

*The following information must also be provided on all Affiliates or other entities relevant to the Applicant’s Primary Mission review.*

Field	PM-A01	Field Type	Picklist
Field Label/Question Text	Indicate the type(s) of document(s) presented as evidence of the Affiliate’s (or other relevant entity’s) current mission.		
Response	Select all that apply: <ul style="list-style-type: none"> <li>Legal Entity documents.</li> <li>Bylaws.</li> <li>Governing or managing board resolution.</li> <li>Owner resolution/ directive.</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response to identify the type(s) of document(s) being presented as evidence that the Applicant has the promotion of community development as its current binding mission.			
<p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p>			
While the label/question for this field indicates that Affiliates and/or other entities relevant to the Applicant’s CDFI Certification Primary Mission review need only demonstrate that their mission/activity is supportive of the Applicant’s community development mission, if the Applicant is subject to the CDFI Certification collective review, each entity relevant to its collective review process must, like the Applicant, have community development as its primary mission.			
Select owner resolution/directive if a governing leadership-approved resolution/directive will be used to demonstrate an entity’s mission, but the governing leadership for the entity whose mission information is being presented is not a governing board.			
If a governing leadership-approved resolution/directive will be used to demonstrate an entity’s mission, the purpose of the resolution/directive must be to establish the mission. A resolution/directive that identifies an entity’s mission as part of the background information on why the resolution/directive is being made will not be accepted as proof of mission.			
The documentation provided must include evidence that the relevant document is binding, via clear acceptable evidence (in one of the ways allowed by the CDFI Fund) of its approval by the governing leadership of the entity whose mission is being presented, and specifies its approval date, or the document will not be considered valid, which may result in the decline of the CDFI Certification Application. For information on evidence of governing leadership approval accepted for CDFI Certification purposes, see <a href="#">“Evidence that a Document is Governing Leadership-Approved”</a> in the CDFI Certification – Documentation Requirements section this guidance manual.			

The name of the entity whose mission is being presented must show clearly in the mission document and must match its current entity name as it appears in the Affiliate record in the Applicant’s AMIS account or documentation filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry. The entity name in the governance document must be linked to the current entity name in AMIS.

The effective date of the current mission document must be as of or prior to the date of submission of the CDFI Certification Application.

Mission documentation must be provided for each entity relevant to the review of the Applicant’s compliance with the CDFI Certification Primary Mission requirements.

Field	PM-A02	Field Type	Attachment
Field Label/Question Text	Attach all document(s) needed to evidence the Affiliate’s (or other relevant entity’s): <ul style="list-style-type: none"> <li>Current Mission;</li> <li>Governing or managing board or owner approval of the current mission; and</li> <li>Date the current mission went into effect.</li> </ul>		
Response	Attach all documents		

**Response Instruction(s)**

Attach the document(s) identified in the preceding field that evidences the Applicant’s current binding mission.

The requirement of evidence of governing, managing board or owner approval of the current mission, the CDFI Fund means that the mission must have been approved by the entity’s governing leadership and that the document(s) provided to demonstrate the current mission must include evidence of that governing leadership approval.

**NOTE:** CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.

If Affiliate is either a Certified CDFI, Certified CDE, or Solely Engaged in Federal Financing Activity, leave “Drag & Drop” feature empty.

Field	PM-A03	Field Type	Picklist
Field Label/Question Text	Indicate how the document(s) demonstrate governing or managing board or owner approval of the Affiliate’s (or other relevant entity’s) current mission documentation.		
Response	Select all that apply:		

	<ul style="list-style-type: none"> <li>A. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified that indicates the document was approved by the governing leadership and specifies its approval date.</li> <li>B. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document, but clearly references it indicating that the document or the governing leadership decision it records was approved by the governing leadership and specifies its approval date.</li> <li>C. Document provides evidence that it was filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.</li> <li>D. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.</li> <li>E. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.</li> </ul>
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**Response Instruction(s)**

Select the appropriate response(s) to identify how the attached mission related documentation evidences that it is approved by the Affiliate’s governing leadership.  
 “Governing or managing board or owner approval” means governing leadership approval.  
 The documentation provided must show that the relevant document is binding via clear acceptable evidence (in one of the ways allowed by the CDFI Fund) of its approval by the Affiliate’s governing

leadership and of its approval date or the document will not be considered valid, which may result in the decline of the CDFI Certification Application. For information on evidence of governing leadership approval accepted by the CDFI Fund for CDFI Certification purposes, see [“Evidence That a Document Is Governing Leadership-Approved”](#) in the CDFI Certification – Documentation Requirements section of this guidance manual.

**The letter response options in the Application form represent each of the following responses which correspond with applicable letter:**

- A. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the relevant document when it was ratified that indicates the document was approved by the governing leadership and specifies its approval date.
- B. Statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the relevant document, but clearly references it, indicates that the document or the governing leadership decision it records was approved by the governing leadership and specifies its approval date.
- C. Document provides evidence that it was filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry.
- D. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was incorporated into the minutes when they were originally prepared affirms that the minutes are true and accurate.
- E. Governing leadership meeting minutes confirm governing leadership approval of the relevant document or the governing leadership decision it records and the meeting date and a statement validly signed by a governing leader(s) or official Corporate Secretary (i.e., signed with a verifiable signature – either an actual manual signature or an electronic signature that involved a formal electronic signer authentication process) that was prepared separately from the original minutes, but clearly references the version of the minutes provided affirms that they are true and accurate.

Field	PM-A04	Field Type	Picklist
Field Label/Question Text	Indicate how the document(s) demonstrates the date the current mission went into effect		
Response	Select all that apply: <ul style="list-style-type: none"> <li>The document(s) shows the date it was adopted via the date it was signed.</li> <li>The document(s) is supplemented by official governing leadership meeting minutes that clearly indicate the date of the meeting at which the document(s) was adopted.</li> </ul>		

	<ul style="list-style-type: none"> <li>The document(s) is supplemented by a statement that clearly indicates the date the document(s) was approved by the governing or managing board or owner.</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response to confirm how the mission-related documentation evidences the date when the mission became effective.			
<b>Field</b>	<b>PM-A05</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Affiliate’s (or other relevant entity’s) current mission as stated in the attached mission documentation.		
<b>Response</b>	Enter current mission.		
<b>Response Instruction(s)</b>			
Enter the Affiliate’s current mission verbatim, which can be confirmed in the attached mission-related documentation. If Affiliate is either a Certified CDFI, Certified CDE, or Solely Engaged in Federal Financing Activity, enter “N/A.”			
<b>Field</b>	<b>PM-A06</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Page number(s) in the attached mission documentation where the Affiliate’s (or other relevant entity’s) current mission is articulated.		
<b>Response</b>	Enter page number(s).		
<b>Response Instruction(s)</b>			
Enter the exact page number(s) in the attached mission document(s) where the current mission can be found. If Affiliate is either a Certified CDFI, Certified CDE, or Solely Engaged in Federal Financing Activity, enter “N/A.”			
<i>Repeat the prior mission documentation fields, as needed, until mission documentation for <b>at least six consecutive full calendar months</b> prior to the submission of the CDFI Certification Application has been provided.</i>			

### 5.5.7. Affiliates – Primary Mission – Responsible Financing Practices

To meet the CDFI Certification Primary Mission standards for responsible financing practices, each Affiliate or other entity relevant to the CDFI Certification review should provide Financial Products and Financial Services that are consistent with promoting community development. Such Financial Products should not harm consumers, be affordable, be originated based upon an assessment of whether a borrower can pay back a loan and have terms and conditions that are transparent and understandable to the borrower. Each of their Affiliates or other entities relevant to a CDFI Certification review should practice transparency, fair collections, and compliance with federal, State, and local laws and regulations. The CDFI Fund also considers the safety, affordability, and transparency of an entity’s Financial Services to be an important aspect of its commitment to community development.

The CDFI Certification Application asks a series of questions related to eligible Financial Products and eligible Financial Services activity engaged in by each Affiliate or other entity relevant to its CDFI Certification review to determine whether that activity is consistent with the responsible financing principles and with a commitment to community development. These questions apply to *all* eligible Financial Products and eligible Financial Services activity engaged in by an Applicant and each of its Affiliates or other entities relevant to its CDFI Certification review, not only those directed to an allowable Target Market component(s).

Sections “[CDFI Certification and Disqualifying Financing Practices](#)”, “[CDFI Certification and Financing Practices Requiring Further Explanation](#)”, and “[Obtaining Determination to Amend a Responsible Financing Practices Standard\(s\)](#)” convey more information on the CDFI Certification Primary Mission responsible financing practices.

<b>NOTE</b>	Affiliates that are separately Certified CDFIs or Community Development Entities (CDEs) when the CDFI Certification review of the other entity is being conducted, as well as Affiliates whose sole activity is the participation in other federal financing programs are presumed to meet the CDFI Certification primary mission requirements. Applicant may select “N/A - Affiliate is either a Certified CDFI, Certified CDE, or Solely Engaged in Federal Financing Activity” in the Affiliates – Primary Mission – Responsible Financing Practices and Affiliates – Primary Mission – Responsible Financing Practices - Financial Services sections data-fields of the CDFI Certification Application for any applicable Affiliate relevant to the CDFI Certification review.
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**Affiliate - Responsible Financing Practices – (PM) Data Fields**

Field	PM-A13	Field Type	Picklist
Field Label/Question Text	Has the CDFI Fund provided the Affiliate with documentation of any amended standards for responsible financing practices applicable to the Affiliate’s own financing practices for the purpose of CDFI Certification?		
Response	Yes or No		

Response Instruction(s)			
<p>Select the appropriate response to indicate whether the CDFI Fund provided the Applicant with documentation of any amended standards for responsible financing practices applicable to the Applicant’s own financing practices for the purpose of CDFI Certification. Select “No” if the Applicant has not requested consideration of an amended responsible lending standard.</p>			
<p><i>Questions <b>PM-A14 through PM-A22</b> will be asked of Affiliates that offer loan products (including credit cards or purchased loans) only.</i></p>			
Field	PM-A14	Field Type	Picklist
Field Label/Question Text	<p>Do the Affiliate's underwriting standards for each of its covered mortgage, consumer, and/or small business loan products include an assessment of the borrower’s ability to pay back the loan according to the terms of the loan, meet any of the borrower’s other major financial obligations, and still pay basic expenses, without having to reborrow or refinance (except for any final mortgage balloon payment)?</p>		
Response	<p>Yes, No, or N/A (i.e., does not offer covered mortgage, consumer, or small business loan products).</p>		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether the Affiliate’s underwriting standards for each of its covered mortgage, consumer, and/or small business loan products include an assessment of the borrower’s ability to pay back the loan according to the terms of the loan, meet any of the borrower’s other major financial obligations, and still pay basic expenses without having to reborrow or refinance (except for any final mortgage balloon payment).</p> <p>The Affiliate should respond as it pertains to all consumer and small business loans; however, there are some exclusions for mortgage loans.</p> <p><u>For purposes of this question (PM-A14), a covered mortgage loan product is limited to a consumer credit transaction that is secured by a lien on a single-family, owner-occupied residence <i>other than</i>:</u></p> <ul style="list-style-type: none"> <li>(i) A reverse mortgage subject to 12 CFR 1026.33;</li> <li>(ii) A temporary or “bridge” loan with a term of 12 months or less, such as a loan to finance the purchase of a new dwelling where the consumer plans to sell a current dwelling within 12 months or a loan to finance the initial construction of a dwelling;</li> <li>(iii) A construction phase of 12 months or less of a construction-to-permanent loan;</li> <li>(iv) An extension of credit made pursuant to a program administered by a Housing Finance Agency, as defined under 24 CFR 266.5;</li> <li>(v) An extension of credit made pursuant to a program administered by the U.S. Department of Housing and Urban Development, the U.S. Department of Veterans Affairs, or the U.S. Department of Agriculture;</li> <li>(vi) A transaction that does not require payment of interest; or</li> <li>(vii) A transaction made for the purpose of foreclosure avoidance or prevention.</li> </ul>			

Applicants are not required to use the ability to repay standards and metrics established by the CFPB to demonstrate they have underwritten a consumer, mortgage, and/or small business loan to ensure the borrower has the ability to pay back that loan.

CDFIs are exempted from CFPB’s Ability to Repay/Qualified Mortgage (ATR/QM) rule (12 CFR § 1026.43) and the CDFI Fund does not require Applicants for Certification to meet the specific ATR requirements prescribed by the rule. However, for the purposes of CDFI Certification, the CDFI Fund regards the consideration of a borrower’s ability to pay back a loan as a basic principle of responsible financing practices. The CDFI Fund also notes that regulated entities already are subject to prudential standards that require the consideration of a borrower’s ability to repay a loan.<sup>20</sup>

The CDFI Fund’s Certification standards for responsible financing practices do not dictate how an Applicant underwrites its loans to determine a borrower’s ability to pay back a loan. An Applicant that does not use the underwriting standards prescribed by CFPB may still meet the standard for Certification through alternative underwriting approaches that consider a borrower’s ability to pay back a loan including, for example, the use of qualitative compensating factors, alternative data (such as a cash flow analysis based on deposit account activity or rent payment history), or alternative or more inclusive credit models (including higher debt to income ratios).

If an Applicant does not consider a borrower’s ability to pay back a loan for any of its covered mortgages, consumer or small business loan products, it may offer an explanation of how this otherwise ineligible practice serves a community development purpose and is consistent with a community development mission.

*If PM-A14 is “No”, PM-A14.1 will become visible for the Affiliate*

Field	PM-A14.1	Field Type	Narrative
Field Label/Question Text	If “No,” please explain how the absence of consideration of whether the borrower is able to pay back each type of loan serves a community development purpose.		
Response	Provide narrative		
Response Instruction(s)			

**If “No” to PM-A14**, the Applicant must explain how the Affiliate’s absence of consideration of whether the borrower is able to pay back each type of loan serves a community development purpose.

<sup>20</sup> See, for example, the FDIC’s Interagency Guidelines Establishing Standards for Safety and Soundness (12 CFR Appendix A to Part 364, Title 12), which state in part that “An institution should establish and maintain loan documentation practices that... [i]dentify the purpose of a loan and the source of repayment, and assess the ability of the borrower to repay the indebtedness in a timely manner” (12 CFR Appendix-A-to-Part-364 C.2). The guidelines similarly state that the institution also “should establish and maintain prudent credit underwriting practices that [p]rovide for consideration, prior to credit commitment, of the borrower’s overall financial condition and resources, the financial responsibility of any guarantor, the nature and value of any underlying collateral, and the borrower’s character and willingness to repay as agreed” (12 CFR Appendix-A-to-Part-364 D.3).

An Affiliate that does not originate based upon an assessment of whether a borrower is able to pay back a loan may be determined ineligible for CDFI Certification.

**[CLARIFYING UPDATE 07/05/2025]**

Applicant’s narrative must include references to:

- Geographic and/or demographic market served and the needs and/or opportunities with quantitative data or qualitative input from members of that market;
- Community development goals and objectives and how the entity plans to achieve them;
- How eligible Financial Products and/or Financial Services and Development Services are expected to improve social or economic conditions in the relevant market.

The narrative should also include the following supporting examples, including but not limited to:

- Loan product rates, terms, and conditions;
- Protections that mitigate potential consumer harm of the loan product such as those that ensure borrower affordability and successful repayment of principal, interest, and fees in a reasonable time frame without encouraging reborrowing, rollovers, or immediate collection in the event of default;
- Evidence that consumers are not harmed (e.g., the rate of successful repayments under the original rates, terms, and conditions of the product); or
- Evidence that the credit risk of the loan product is retained by the applicant or transferred (e.g., through sale of the loan product).

*Only for Affiliates that originate, purchase interests in, offer, arrange, market, or service any consumer loan products (including credit cards or purchased loans) that allow for an annual percentage rate in excess of 36% when that rate is calculated using the MAPR standard.*

Field	PM-A15	Field Type	Picklist
Field Label/Question Text	Does the Affiliate originate, purchase interests in, offer, arrange, market, or service any consumer loan products (including credit cards and purchased loans) that allow for an annual percentage rate in excess of 36% when that rate is calculated using the Military Annual Percentage Rate (MAPR) standard? <sup>21</sup> ?		
Response	Yes, No, or N/A (i.e., does not offer consumer loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Affiliate originates, purchases interests in, offers, arranges, markets, or services any consumer loan products (including credit cards and			

<sup>21</sup> For additional guidance on calculating the MAPR, see the CFPB’s Military Lending Act (MLA), Interagency Examination Procedures—2015 Amendments, Terms of Consumer Credit Extended to Covered Borrowers (Calculation of MAPR), 32 CFR 232.4, pp. 6-9.

<p>purchased loans) that allow for an APR in excess of 36% when that rate is calculated using the Military Annual Percentage Rate standard.</p> <p>If “Yes,” the Applicant will be required to respond to additional financing-practices questions about the Affiliate’s consumer loan products that allow for an APR in excess of 36% when that rate is calculated using the MAPR standard.</p>			
<p><i>If PM-A15 is “Yes”, PM-A15.1 through PM-A15.7 will become visible for the Affiliate</i></p>			
<b>Field</b>	<b>PM-A15.1</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	<p><b>If “Yes”:</b> What is the current highest allowable MAPR charged on any of the Affiliate's consumer loans (including credit cards and purchased loans)?</p>		
<b>Response</b>	<p>Enter the highest allowable MAPR on any of the Affiliate’s consumer loan products.</p>		
<b>Response Instruction(s)</b>			
<p>If “Yes” to PM-A15, enter the highest allowable MAPR on any of the Affiliate’s consumer loan products (including credit cards and purchased loans).</p>			
<p>Questions <b>PM-A15.2 through PM-A15.7</b> – For any consumer loan product with an MAPR in excess of 36%:</p>			
<b>Field</b>	<b>PM-A15.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p>Did any of the consumer loan products in question have an annual default rate over 5% during the 12 full months immediately prior to submission of the Application?<sup>22</sup></p>		
<b>Response</b>	<p>Yes or No</p>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to determine whether any of the consumer loan products with an MAPR in excess of 36% had an annual default rate over 5% during the 12 full months immediately prior to submission of the Application.</p> <p>If “Yes,” the Applicant is not eligible for CDFI Certification.</p>			
<b>Field</b>	<b>PM-A15.3</b>	<b>Field Type</b>	Picklist

<sup>22</sup> Calculate on a per borrower basis for single payment loans.

<b>Field Label/ Question Text</b>	Do any of the consumer loans in question include a leveraged payment mechanism? <sup>23</sup>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to determine whether any of the consumer loans in question include a leveraged payment mechanism. If <b>“Yes,”</b> the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM-A15.4</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	If the product in question includes loans of \$1,000 or less, have the repayment timeframes been limited to no more than 12 months?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer loans of \$1,000 or less)		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the product in question includes loans of \$1,000 or less, and have the repayment timeframes been limited to no more than 12 months. If <b>“No,”</b> the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM-A15.5</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	For a period of 12 full months after the issuance of such a consumer loan, does the Affiliate waive any upfront fees for any refinance or new loan issued to the same borrower?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether for a period of 12 full months after the issuance of such a consumer loan, the Affiliate waives any upfront fees for any refinance or new loan issued to the same borrower. If <b>“No,”</b> the Applicant is not eligible for CDFI Certification.			

<sup>23</sup> The CDFI Fund will rely on the CFPB’s definition of a leveraged payment mechanism: “A loan has a leveraged payment mechanism if the lender or a service provider has the right to initiate a transfer of money, through any means, from a consumer’s account to satisfy an obligation on a loan.” See CFPB final rule and interpretations, Payday, Vehicle Title, and Certain High-Cost Installment Loans, 12 CFR 1041.3(c).

<b>Field</b>	<b>PM-A15.6</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Are all fees spread evenly over the life of the loan and pro rata refundable in the event of early repayment (including through a refinance) for each of the Affiliate's consumer installment loan products in question?		
<b>Response</b>	Yes or No, or N/A (i.e., does not offer consumer installment loan products with an MAPR in excess of 36%).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether all fees spread evenly over the life of the loan and pro rata refundable in the event of early repayment (including through a refinance) for each of the Affiliate's consumer installment loan products in question. <b>If "No,"</b> the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM-A15.7</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Are all loan payments substantially equal and do they amortize smoothly to a zero balance by the end of the loan term for each of the Affiliate's consumer installment loan products in question?		
<b>Response</b>	Yes or No, or N/A (i.e., does not offer consumer installment loan products with an MAPR in excess of 36%).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether all loan payments substantially equal and amortize smoothly to a zero balance by the end of the loan term for each of the Affiliate's consumer installment loan products in question. <b>If "No,"</b> the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM-A16</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Affiliate originate, purchase interests in, offer, arrange, market, or service small business loan products (including credit cards and purchased loans) that allow for an annual percentage rate in excess of 36%?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer small business loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Affiliate originates, purchase interests in, offer, arrange, market, or service small business loan products (including credit cards and purchased loans) that allow for an APR in excess of 36%.			

<p>If <b>“Yes,”</b> the Applicant will be required to respond to additional financing-practices questions about the Affiliate’s small business loan products that allow for an APR in excess of 36%.</p>			
<p>If <b>“Yes,”</b> Only for Affiliate that originate, purchase interests in, offer, arrange, market, or service any small business loan products (including credit cards or purchased loans) that allow for an APR in excess of 36%.  <b>If PM-A16 is “Yes”, PM-A16.1 through PM-A16.6 will become visible for the Applicant.</b></p>			
<b>Field</b>	<b>PM-A16.1</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	What is the current highest allowable APR charged on any of the Affiliate’s small business loans (including credit cards and purchased loans)?		
<b>Response</b>	Enter the highest allowable APR on any of the Affiliate’s small business loan products.		
<b>Response Instruction(s)</b>			
Enter the highest allowable APR charged on any of the Applicant’s small business loans (including credit cards and purchased loans).			
Questions <b>PM-A16.2 through PM-A16.6</b> – For any small business loan product with an APR in excess of 36%:			
<b>Field</b>	<b>PM-A16.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Did any of the small business loan products in question have an annual default rate over 5% during the 12 full months immediately prior to submission of the Application? <sup>24</sup>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether any of the small business loan products in question have an annual default rate over 5% during the 12 full months immediately prior to submission of the Application.			

<sup>24</sup> Calculate on a per borrower basis for single payment loans.

<b>Field</b>	<b>PM-A16.3</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Do any of the small business loans in question include a leveraged payment mechanism? <sup>25</sup>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether any of the small business loans in question include a leveraged payment mechanism.			
<b>Field</b>	<b>PM-A16.4</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Are all fees spread evenly over the life of the loan and pro rata refundable in the event of early repayment (including through a refinance) for each of the Affiliate's small business installment loan products in question?		
<b>Response</b>	Yes or No, or N/A (i.e., does not offer small business installment loan products with an APR in excess of 36%).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether all fees are spread evenly over the life of the loan and are pro rata refundable in the event of early repayment (including through a refinance) for each of the Affiliate's small business installment loan products in question.			
<b>Field</b>	<b>PM-A16.5</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Are all installment loan payments substantially equal and do they amortize smoothly to a zero balance by the end of the loan term for each of the Affiliate's small business installment loan products in question?		
<b>Response</b>	Yes or No, or N/A (i.e., does not offer small business installment loan products with an APR in excess of 36%).		

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<sup>25</sup> The CDFI Fund will rely on the CFPB's definition of a leveraged payment mechanism: "A loan has a leveraged payment mechanism if the lender or a service provider has the right to initiate a transfer of money, through any means, from a consumer's account to satisfy an obligation on a loan." See CFPB final rule and interpretations, Payday, Vehicle Title, and Certain High-Cost Installment Loans, 12 CFR 1041.3(c).

Response Instruction(s)			
Select the appropriate response to indicate whether all installment loan payments are substantially equal amortize smoothly to a zero balance by the end of the loan term for each of the Affiliate’s small business installment loan products in question.			
Field	PM-A16.6	Field Type	Text
Field Label/Question Text	If the Affiliate responded “Yes” to either questions PM-A16.2 or PM-A16.3 or responded “No” to either questions PM-A16.4 or PM-A16.5, describe why the small business loan product should be considered consistent with an acceptable community development mission.		
Response	Provide narrative		
Response Instruction(s)			
An Affiliate that offers a small business loan product with an APR in excess of 36% <i>and</i> responded “Yes” to either question PM-A16.2 or PM-A16.3 or responded “No” to either PM-A16.4 or PM-A16.5 may be determined ineligible for CDFI Certification. <b>[CLARIFYING UPDATE 07/05/2025]</b> An Applicant’s narrative must include references to: <ul style="list-style-type: none"> <li>• Geographic and/or demographic market served and the needs and/or opportunities with quantitative data or qualitative input from members of that market;</li> <li>• Community development goals and objectives and how the entity plans to achieve them; and</li> <li>• How eligible Financial Products and/or Financial Services and Development Services are expected to improve social or economic conditions in the relevant market.</li> </ul>			
<b>PM-A17</b>	For each of the Affiliate’s small business loan products, does the Affiliate disclose in writing: <sup>26</sup>		
Field	PM-A17.1	Field Type	Picklist
Field Label/ Question Text	The periodic payment due?		
Response	Yes, No, or N/A (i.e., does not offer small business loan products).		

<sup>26</sup> Beginning January 1, 2026, new Applicants that offer small business loan products that do not disclose, in writing, the periodic payment due, the total amount to be repaid over the life of the loan, the total finance charges over the life of the loan, or the APR of the loan will be ineligible for CDFI Certification. Certified CDFIs that offer small business loan products will be required to attest in their ACR to making such disclosures no later than October 1, 2026, in order to maintain their certification.

Response Instruction(s)			
Select the appropriate response to indicate whether the Affiliate discloses the period payment due in writing for each small business loan product it offers.			
Field	PM-A17.2	Field Type	Picklist
Field Label/ Question Text	The total amount to be repaid over the life of the loan?		
Response	Yes, No, or N/A (i.e., does not offer small business loan products).		
Response Instruction(s)			
Select the appropriate response to indicate whether the Affiliate discloses the total amount to be repaid over the life of the loan for each small business loan product it offers.			
Field	PM-A17.3	Field Type	Picklist
Field Label/ Question Text	The total finance charges over the life of the loan?		
Response	Yes, No, or N/A (i.e., does not offer small business loan products)		
Response Instruction(s)			
Select the appropriate response to indicate whether the Affiliate discloses the total finance charges over the life of the loan for each small business loan product it offers.			
Field	PM-A17.4	Field Type	Picklist.
Field Label/ Question Text	The annual percentage rate of the loan?		
Response	Yes, No, or N/A (i.e., does not offer small business loan products)		
Response Instruction(s)			
Select the appropriate response to indicate whether the Affiliate discloses the annual percentage rate of the loan for each small business loan product it offers.			
Field	PM-A18	Field Type	Picklist
Field Label/ Question Text	If the Affiliate is a non-depository institution, does the Affiliate originate, purchase interests in, offer, arrange, market, or service loans that exceed the interest limits that apply to non-depository institutions in the state where the borrower resides?		
Response	Yes, No, or N/A (i.e., Affiliate is a depository institution)		

Response Instruction(s)			
<p>Select the appropriate response to indicate whether the non-depository institution Affiliate originates, purchases interests in, offers, arranges, markets, or services loans that exceed the interest limits that apply to non-depository institutions in the State where the borrower resides. Select “N/A (i.e., Affiliate is a depository institution).” if Applicant is a depository institution. <b>If “Yes,”</b> the Applicant is not eligible for CDFI Certification.</p>			
<p><b>PM-A19</b> For purposes of this question, <b>PM-A19</b>, a covered mortgage loan product is limited to a consumer credit transaction that is secured by a lien on a single-family, owner-occupied residence <i>other than</i>:</p> <p>Transactions secured by a subordinate lien, such as;</p> <ul style="list-style-type: none"> <li>(i) A reverse mortgage subject to 12 CFR 1026.33;</li> <li>(ii) A temporary or “bridge” loan with a term of 12 months or less, such as a loan to finance the purchase of a new dwelling where the consumer plans to sell a current dwelling within 12 months or a loan to finance the initial construction of a dwelling;</li> <li>(iii) A construction phase of 12 months or less of a construction-to-permanent loan;</li> <li>(iv) An extension of credit made pursuant to a program administered by a Housing Finance Agency, as defined under 24 CFR 266.5;</li> <li>(v) An extension of credit made pursuant to a program administered by the U.S. Department of Housing and Urban Development, the U.S. Department of Veterans Affairs, or the U.S. Department of Agriculture;</li> <li>(vi) A transaction that does not require payment of interest;</li> <li>(vii) A transaction made for the purpose of foreclosure avoidance or prevention; or</li> <li>(viii) For PM-A19.2 (loans with interest-only payments) and PM-A19.3 (loans with balloon payments) only, a transaction with a payment schedule that is adjusted to the seasonal or irregular income of the consumer.</li> </ul>			
<p><i>For each of the Affiliate’s covered mortgage loan products, does the Applicant:</i></p>			
Field	PM-A19.1	Field Type	Picklist
Field Label/ Question Text	Offer covered mortgage loans that include negative amortization?		
Response	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether the Affiliate engages in any covered mortgage loan activity that allows negative amortization. <b>If “Yes,”</b> the Applicant is not eligible for CDFI Certification.</p>			

<b>Field</b>	<b>PM-A19.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Offer covered mortgage loans that include interest-only payments?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Affiliate engages in any covered mortgage loan activity that allows interest-only payments. If <b>“Yes,”</b> the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM-A19.3</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Offer covered mortgage loans that include balloon payments? <sup>27</sup>		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Affiliate engages in any covered mortgage loan activity that allows balloon payments.			
<b>If “Yes,” respond to questions PM-A19.3a – PM-A19.3d</b>			
<b>Field</b>	<b>PM-A19.3a</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Do the covered mortgage loans meet the criteria set forth in 12 CFR 1026.43(f)(1)(i)-(vi)?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
If <b>“Yes” to PM-A19.3,</b> select the appropriate response to indicate whether the Affiliate’s covered mortgage loan activity that involves balloon payments meets the criteria set forth in 12 CFR 1026.43(f)(1)(i)-(vi). <b>[CLARIFYING UPDATE 07/05/2025]</b> If the Applicant responds “Yes” to each of the questions PM-A19.3a through PM-A19.3c for its Affiliate, it will be determined to meet the relevant standard for responsible financing practices. If the Applicant responds “No” to any of the questions PM-A19.3a through PM-A19.3c for its Affiliate, in order to demonstrate eligibility, it must describe in PM-A19.3d how such loans are			

<sup>27</sup> A balloon payment is a payment that is more than two times a regular periodic payment.

<p>advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</p>			
<b>Field</b>	<b>PM-A19.3b</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/ Question Text</b>	<p>If the Affiliate renews the loan when the balloon payment is due, does the new loan retain the original amortization period?</p>		
<b>Response</b>	<p>Yes or No</p>		
<b>Response Instruction(s)</b>			
<p><b>If “Yes” to PM-A19.3</b>, select the appropriate response to indicate whether, if the Affiliate renews a covered mortgage loan that includes a balloon payment when the balloon payment is due, the new loan retains the original amortization period.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>If the Applicant responds “Yes” to each of the questions PM-A19.3a through PM-A19.3c for its Affiliate, it will be determined to meet the relevant standard for responsible financing practices.</p> <p>If the Applicant responds “No” to any of the questions PM-A19.3a through PM-A19.3c for its Affiliate, in order to demonstrate eligibility, it must describe in PM-A19.3d how such loans are advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</p>			
<b>Field</b>	<b>PM-A19.3c</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/ Question Text</b>	<p>If the Affiliate renews the loan when the balloon payment is due, does the Affiliate (as permitted by regulation) waive the need for a new appraisal and limit application and origination fees?</p>		
<b>Response</b>	<p>Yes or No</p>		
<b>Response Instruction(s)</b>			
<p><b>If “Yes” to PM-A19.3</b>, select the appropriate response to indicate whether, if the Affiliate renews a covered mortgage loan that includes a balloon payment when the balloon payment is due, it (as permitted by regulation) waives the need for a new appraisal and limit application and origination fees.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>If the Applicant responds “Yes” to each of the questions PM-A19.3a through PM-A19.3c for its Affiliate, it will be determined to meet the relevant standard for responsible financing practices.</p> <p>If the Applicant responds “No” to any of the questions PM-A19.3a through PM-A19.3c for its Affiliate, in order to demonstrate eligibility, it must describe in PM-A19.3d how such loans are</p>			

<p>advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</p>			
Field	PM-A19.3d	Field Type	Text
Field Label/ Question Text	<p>If the Affiliate responded “No” to any of the questions PM-A19.3a – PM-A19.3c, please describe how such loans are advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</p>		
Response	<p>Provide narrative</p>		
Response Instruction(s)			
<p><b>If “Yes” to PM-A19.3 and if “No” was selected in PM-A19.3a, PM-A19.3b, or PM-A19.3c, fully describe how such loans are advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</b></p> <p>An Applicant that offers covered mortgage loan products that include balloon payments and that responded “No” to any of the questions PM-A19.3a through PM-A19.3c may be determined to be ineligible for CDFI Certification.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>If the Applicant responds “No” to any of the questions PM-A19.3a through PM-A19.3c for its Affiliate, in order to demonstrate eligibility, it must describe in PM-A19.3d how such loans are advantageous to the borrower, any additional protections that limit potential harm to the borrower, and why the loan should be considered consistent with an acceptable community development mission.</p> <p>An Applicant’s narrative must include references to:</p> <ul style="list-style-type: none"> <li>• Geographic and/or demographic market served and the needs and/or opportunities with quantitative data or qualitative input from members of that market;</li> <li>• Community development goals and objectives and how the entity plans to achieve them;</li> <li>• How eligible Financial Products and/or Financial Services and Development Services are expected to improve social or economic conditions in the relevant market;</li> </ul> <p>The narrative should also include supporting examples, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Loan product rates, terms, and conditions;</li> <li>• Protections that mitigate potential consumer harm of the loan product such as those that ensure borrower affordability and successful repayment of principal, interest, and fees in a reasonable time frame without encouraging reborrowing, rollovers, or immediate collection in the event of default;</li> <li>• Evidence that consumers are not harmed (e.g., the rate of successful repayments under the original rates, terms, and conditions of the product);</li> <li>• Evidence that the credit risk of the loan product is retained by the applicant or transferred (e.g., through sale of the loan product).</li> </ul>			

<p>In addition:</p> <ul style="list-style-type: none"> <li>• If the Applicant responded “No” to PM-A19.3a, in addition to the community development purpose of the covered mortgage loan product, it should explain in its narrative which criteria from 12CFR§§ 1026.43(f)(1)(i)(vi) it does not meet.</li> <li>• If the Applicant responded “No” to PM-A19.3b, it should clarify: (1) how it helps borrowers refinance their mortgage with another lender at reasonable rates and terms if it does not renew the loan when the balloon payment is due, or how it ensures borrowers can make the balloon payment without having to sell their home; or (2) if it renews the covered mortgage but does not retain the original amortization period, it should explain why and how it assists the borrower in building equity.</li> </ul> <p>If the Applicant responded “No” to PM-A19.3c, it should explain (1) how it assists borrowers in refinancing their mortgage with another lender at reasonable rates and terms if it does not renew the covered mortgage loan when the balloon payment is due, or how it ensures borrowers can make the balloon payment without selling their home; or (2) if it renews the loans but does not waive the need for new appraisal or limit application or origination fees as allowed by regulation, it should explain why and how it minimized refinancing cost of the borrower.</p>			
<b>Field</b>	<b>PM-A19.4</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Underwrite adjustable-rate covered mortgages at less than the maximum rate in the first five years?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the Affiliate underwrites adjustable-rate covered mortgages at less than the maximum rate in the first five years.  <b>If “Yes,”</b> the Applicant is not eligible for CDFI Certification.</p>			
<b>Field</b>	<b>PM-A19.5</b>	<b>Field Type</b>	Picklist
<b>Field Label/ Question Text</b>	Offer covered mortgage loans with an original maximum term longer than 30 years?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the Affiliate offers covered mortgage loans with an original maximum term longer than 30 years.</p>			

<i>If “Yes,” PM-A19.5a will become visible for the Affiliate.</i>			
<b>Field</b>	<b>PM-A19.5a</b>	<b>Field Type</b>	<b>Text</b>
<b>Field Label/ Question Text</b>	If “Yes,” for any covered mortgage loans with an original term longer than 30 years, what is the maximum term allowable, and describe why the loan should be considered consistent with an acceptable community development mission.		
<b>Response</b>	Provide narrative		
<b>Response Instruction(s)</b>			
<p><b>If “Yes” was selected in PM-A19.5,</b> for any covered mortgage loans with an original term of 30 years, identify the maximum term allowable and fully describe why the loans should be considered consistent with an acceptable community development mission.</p> <p>An Affiliate that offers covered mortgage loan products with an original maximum term longer than 30 years may be determined to be ineligible for CDFI Certification.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>An Applicant’s narrative must include references to:</p> <ul style="list-style-type: none"> <li>• Geographic and/or demographic market served and the needs and/or opportunities with quantitative data or qualitative input from members of that market;</li> <li>• Community development goals and objectives and how the entity plans to achieve them; and</li> <li>• How eligible Financial Products and/or Financial Services and Development Services are expected to improve social or economic conditions in the relevant market.</li> </ul> <p>The narrative should also include supporting examples, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Loan product rates, terms, and conditions;</li> <li>• Protections that mitigate potential consumer harm of the loan product such as those that ensure borrower affordability and successful repayment of principal, interest, and fees in a reasonable time frame without encouraging reborrowing, rollovers, or immediate collection in the event of default;</li> <li>• Evidence that consumers are not harmed (e.g., the rate of successful repayments under the original rates, terms, and conditions of the product); and</li> <li>• Evidence that the credit risk of the loan product is retained by the applicant or transferred (e.g., through sale of the loan product).</li> </ul>			
<b>Field</b>	<b>PM-A19.6</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/ Question Text</b>	Verify the income or assets of the borrower of a covered mortgage loan product?		
<b>Response</b>	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		

Response Instruction(s)			
<p>Select the appropriate response to indicate whether the Affiliate verifies the income or assets of the borrower of a covered mortgage loan.</p> <p><b>If “No,”</b> the Applicant is not eligible for CDFI Certification.</p> <p>For purposes of CDFI Certification eligibility, an Applicant that offers covered mortgage loan products must verify the borrower’s income or assets using third party records that provide reasonably reliable evidence of the borrower’s income or assets. The Applicant may verify the consumer’s income using a tax-return transcript issued by the Internal Revenue Service (IRS). As described in 12 CFR 1026.43(c)(4), examples of other records the Applicant may use to verify the consumer’s income or assets include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Copies of tax returns the consumer filed with the IRS or a State taxing authority;</li> <li>• IRS Form W-2s or similar IRS forms used for reporting wages or tax withholding;</li> <li>• Payroll statements, including military Leave and Earnings Statements;</li> <li>• Financial institution records;</li> <li>• Records from the consumer’s employer or a third party that obtained information from the employer; Records from a Federal, State, or local government agency stating the consumer’s income from benefits or entitlements;</li> <li>• Receipts from the consumer’s use of check cashing services; and</li> <li>• Receipts from the consumer’s use of a funds transfer service.</li> </ul>			
Field	PM-A19.7	Field Type	Picklist
Field Label/ Question Text	Charge upfront points and fees on a covered mortgage loan product in excess of the Qualified Mortgage limits?		
Response	Yes, No, or N/A (i.e., does not offer covered mortgage loan products).		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether the Affiliate charges upfront points and fees on a covered mortgage loan product in excess of the Qualified Mortgage Limits.</p> <p>The Qualified Mortgage limits on upfront points and fees are adjusted annually for inflation on January 1.</p> <p>See <a href="#">12 C.F.R. § 1026.43(e)(3)</a> and <a href="#">Comment 43(e)(3)(ii)-1</a> for the annual limits.</p> <p><b>If “Yes,”</b> the Applicant is not eligible for CDFI Certification.</p>			
Field	PM-A20	Field Type	Picklist
Field Label/ Question Text	Select the tools the Affiliate uses to assist struggling borrowers.		
Response	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• Fees or interest waivers.</li> <li>• Interest rate reductions.</li> <li>• Loan term extensions.</li> <li>• Principal forbearance.</li> <li>• Principal forgiveness.</li> </ul>		

<ul style="list-style-type: none"> <li>• Other.</li> <li>• None.</li> <li>• N/A-Entity does not engage in any eligible Financial Product activity.</li> </ul>			
<b>Response Instruction(s)</b>			
Select the appropriate response(s) to indicate the tool(s) the Applicant uses to assist struggling borrowers.			
<i>If PM-A20 is "Other", PM-A20.1 will become visible for the Applicant</i>			
<b>Field</b>	<b>PM-A20.1</b>	<b>Field Type</b>	<b>Text</b>
<b>Field Label/ Question Text</b>	If "Other," please describe.		
<b>Response</b>	Provide description.		
<b>Response Instruction(s)</b>			
If "Other" was selected in PM-A20, describe the "other" tool(s) the Affiliate uses to assist struggling borrowers.			
<b>Field</b>	<b>PM-A21</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/ Question Text</b>	Does the Affiliate sell its charged off consumer or small business debt to debt buyers?		
<b>Response</b>	Yes, No, or N/A-Entity does not engage in any eligible Financial Product activity.		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Affiliate sells its charged-off consumer or small business debt to debt buyers. If "Yes," the Applicant is not eligible for CDFI Certification.			
<b>Field</b>	<b>PM-A22</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/ Question Text</b>	If the Affiliate is an FDIC-insured depository institution, does the Affiliate have a current Community Reinvestment Act rating of Satisfactory or higher?		
<b>Response</b>	Yes, No, or N/A (i.e., not an FDIC-insured depository institution).		

Response Instruction(s)			
<p>For FDIC-insured depository institutions, select the appropriate response to indicate whether the current Community Reinvestment Act rating is Satisfactory or higher.  <b>If “No,”</b> the Applicant is not eligible for CDFI Certification.</p>			
<p><i>PM-A23 and PM-A24 will be asked only of entities that offer Equity Investment Financial Products.</i></p>			
Field	PM-A23	Field Type	Picklist
Field Label/Question Text	<p>Does the Affiliate have a policy or practice in place for its Equity Investment Financial Products that prevents the Affiliate from gaining Control over an investee, except if the Affiliate must save a business through ownership as a last resort for a limited period of time?</p>		
Response	<p>Yes, No, or N/A (i.e., does not offer equity products).</p>		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether the Affiliate has a policy or practice in place for its Equity Investment Financial Products that prevents it from gaining Control over an investee except if it must save the relevant business through ownership as a last resort and only for a limited period of time.  <b>If “No,”</b> the Applicant is not eligible for CDFI Certification.</p>			
Field	PM-A24	Field Type	Picklist
Field Label/Question Text	<p>During the 12 full months completed immediately prior to submission of the Application, did the Affiliate leverage, for its own benefit, the assets of any of its active investees?</p>		
Response	<p>Yes, No, or N/A (i.e., does not offer equity products).</p>		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether the Affiliate leveraged the assets of any of its active investees for its own benefit during the 12 full calendar months completed immediately prior to submission of the CDFI Certification Application.  <b>If “Yes,”</b> the Applicant is not eligible for CDFI Certification.</p>			

### 5.5.8. Affiliates – Primary Mission – Responsible Financing Practices - Financial Services

#### Affiliate - Responsible Financing Practices – Financial Services - (PM) Data Fields

<i>PM-A25 through PM-A27 will be asked <b>only</b> for Depository Institutions (Regulated Institutions.)</i>			
Field	PM-A25	Field Type	Picklist
Field Label/Question Text	Select each of the listed features associated with a single checking or share account (including checkless checking) offered by the Affiliate (i.e., only select the features that are offered as part of the same account; if other features are offered by the Affiliate in different accounts, do not include).		
Response	Select all that apply: <ul style="list-style-type: none"> <li>Free access to debit card network for point of sale and bill payment.</li> <li>Minimum opening deposit of \$25 or less.</li> <li>Monthly maintenance fee of \$5 or less if not waivable, or \$10 or less if waivable.<sup>28</sup></li> <li>No overdraft or nonsufficient funds fees.<sup>29</sup></li> <li>No account activation, closure, dormancy, inactivity, or low-balance fees.</li> <li>Free and unrestricted branch access or (for Applicants without branches) access to free ATM network and free remote deposits.</li> <li>Free and unrestricted telephone banking (including live support).</li> <li>Free and unrestricted in-network ATM access.</li> <li>Out-of-network ATM fee of \$2.50 or less, or up to \$3.00 if free access to a partner ATM network is also provided.</li> <li>Free deposit capability for cash and checks in-branch and at ATM (when available) and direct deposit.</li> <li>Free bill pay if available or at least four free money orders and/or cashier checks per month.</li> <li>Free check cashing for checks issued by the Applicant.</li> <li>Free online banking, mobile banking, and banking alerts (if offered).</li> </ul>		

<sup>28</sup> For monthly maintenance fee to be considered waivable, the Affiliate must offer at least two options to waive the fee entirely with a single transaction (e.g., direct deposit with no minimum deposit, online bill pay, or debit card purchase).

<sup>29</sup> An overdraft fee is a fee or charge on a consumer's account held by the institution for paying a transaction (including a check or other item) when the consumer's account has insufficient or unavailable funds. A nonsufficient funds fee is a fee or charge on a consumer's account held by the institution for a transaction (including a check or other item) returned unpaid when the consumer's account has insufficient or unavailable funds.

<b>Response Instruction(s)</b>			
<p>Select the appropriate response(s) to identify the feature(s) associated with a <i>single</i> checking or savings account (including checkless checking) offered by the Affiliate. Only select the features that are offered as part of the same account; if other features are offered by the Affiliate in different accounts, do not include them in this response.</p> <p>While the term share account was used in the question/label for this field, the CDFI Fund meant to refer to savings account.</p>			
<b>Field</b>	<b>PM-A25.1</b>	<b>Field Type</b>	<b>Text</b>
<b>Field Label/Question Text</b>	Identify the checking or share account that includes each of the selected features.		
<b>Response</b>	Name account.		
<b>Response Instruction(s)</b>			
Enter the name of the checking or share account that includes each of the selected features identified in PM-A25.			
<b>Field</b>	<b>PM-A26</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	For any of the Affiliate’s depository accounts, is the account holder subject to any potential overdraft fees?		
<b>Response</b>	Yes, No, or N/A-Entity does not engage in any eligible Financial Services activity.		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether, for any of the Affiliate’s depository accounts, the account holder is subject to any potential overdraft fee.			

<b>If “Yes” respond to questions PM-A26.1 through PM-A26.6.</b>			
<b>Field</b>	<b>PM-A26.1</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Specify the highest dollar amount charged for such a fee.		
<b>Response</b>	Enter number		
<b>Response Instruction(s)</b>			
If “Yes” to PM-A26, enter the highest dollar amount that might be charged for any overdraft fee.			
<b>Field</b>	<b>PM-A26.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Can such fees exceed the amount of the item being cleared?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
If “Yes” to PM-A26, select the appropriate response to indicate whether any potential overdraft fee might exceed the amount of the item being cleared.			
<b>Field</b>	<b>PM-A26.2a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Describe why such fees should be considered reasonable and proportionate to the amount of the item being cleared and consistent with an acceptable community development mission.		
<b>Response</b>	Provide narrative		
<b>Response Instruction(s)</b>			
<p>If “Yes” to PM-A26.2, fully describe why overdraft fees that exceed the amount of the item being cleared should be considered reasonable and proportionate to the amount of the item being cleared and consistent with an acceptable community development mission.</p> <p>An Affiliate that charges overdraft fees in excess of the amount of the item being cleared may be determined to be ineligible for CDFI Certification.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>An Applicant should describe how its Affiliate mitigates the risks associated with automated overdraft payment programs and limits customers’ use of overdraft as a short-term, high cost credit option. Examples of such actions can be found in the FDIC’s 2010 guidance on “Overdraft Payment Programs and Consumer Protection” (FIL-81-2010), and include, but are not limited to:</p> <ul style="list-style-type: none"> <li>Monitoring programs for excessive or chronic customer use and contacting such customers (e.g., in person or via telephone) to discuss less costly alternatives to the automated overdraft</li> </ul>			

<p>payment program such as a linked savings account, a more reasonably priced line of credit consistent with safe and sound banking practices, or a safe and affordable small-dollar loan, and giving the customer a reasonable opportunity to decide whether to continue fee-based overdraft coverage or choose another available alternative;</p> <ul style="list-style-type: none"> <li>• Providing access to free or low-cost financial education workshops or financial counseling for customers with frequent overdraft fees;</li> <li>• Honoring requests to opt-out overdraft coverage for non-electronic transactions;</li> <li>• Allowing consumers to affirmatively choose the overdraft payment product that best suits their needs;</li> <li>• Setting daily limits on overdraft fees (see PM-A26.3) and not charging overdraft fees for transactions that overdraw an account by a minimum amount (see PM-A26.2);</li> <li>• Processing transactions to minimize consumer costs; and</li> <li>• Implement additional consumer protection features such as those listed in PM-A26.5.</li> </ul>			
<b>Field</b>	<b>PM-A26.3</b>	<b>Field Type</b>	<b>Numeric</b>
<b>Field Label/Question Text</b>	Specify any <i>daily</i> limits on the number and frequency of such fees that can be charged to an account holder.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Identify any <i>daily</i> limits on the number and frequency of the overdraft fees that can be charged to an account holder.			
<b>Field</b>	<b>PM-A26.4</b>	<b>Field Type</b>	<b>Numeric</b>
<b>Field Label/Question Text</b>	Specify any <i>annual</i> limits on the number and frequency of such fees that can be charged to an account holder.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Identify any <i>annual</i> limits on the number and frequency of the overdraft fees that can be charged to an account holder.			
<b>Field</b>	<b>PM-A26.4a</b>	<b>Field Type</b>	<b>Narrative</b>
<b>Field Label/Question Text</b>	If an account holder may be charged such fees on more than six occasions in a rolling 12-month period, describe why such fees should be considered consistent with an acceptable community development mission.		

<b>Response</b>	Provide narrative.		
<b>Response Instruction(s)</b>			
<p>If an account holder may be charged overdraft fees on more than six occasions in a rolling 12-month period, fully describe why such fees should be considered consistent with an acceptable community development mission.</p> <p>An Affiliate that charges overdraft fees on more than six occasions in a rolling 12-month period may be determined to be ineligible for CDFI Certification.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>An Applicant should describe how its Affiliate mitigates the risks associated with automated overdraft payment programs and limits customers’ use of overdraft as a short-term, high cost credit option. Examples of such actions can be found in the FDIC’s 2010 guidance on “Overdraft Payment Programs and Consumer Protection” (FIL-81-2010), and include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Monitoring programs for excessive or chronic customer use and contacting such customers (e.g., in person or via telephone) to discuss less costly alternatives to the automated overdraft payment program such as a linked savings account, a more reasonably priced line of credit consistent with safe and sound banking practices, or a safe and affordable small-dollar loan, and giving the customer a reasonable opportunity to decide whether to continue fee-based overdraft coverage or choose another available alternative;</li> <li>• Providing access to free or low-cost financial education workshops or financial counseling for customers with frequent overdraft fees;</li> <li>• Honoring requests to opt-out overdraft coverage for non-electronic transactions;</li> <li>• Allowing consumers to affirmatively choose the overdraft payment product that best suits their needs;</li> <li>• Setting daily limits on overdraft fees (see PM-A26.3) and not charging overdraft fees for transactions that overdraw an account by a minimum amount (see PM-A26.2);</li> <li>• Processing transactions to minimize consumer costs; and</li> <li>• Implement additional consumer protection features such as those listed in PM-A26.5.</li> </ul>			
<b>Field</b>	<b>PM-A26.5</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Select each of the listed features included in the Affiliate’s overdraft program.		
<b>Response</b>	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• No overdraft fees on debit card purchases.</li> <li>• No overdraft fees on ATM withdrawals.</li> <li>• No extended/sustained overdraft fees.</li> <li>• Grace period provided before charging an overdraft fee.</li> <li>• Negative balances allowed without triggering an overdraft fee.</li> <li>• Balance-related alerts offered.</li> <li>• Access to real-time balance information.</li> <li>• Consumer’s checking account linked to another account for overdraft protection.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Overdraft fees collected from a consumer’s next deposit only after other items have been posted or cleared.</li> <li>• No additional fees charged when an item is re-presented.</li> <li>• No transfer fees on overdraft transfers from savings or from a credit account.</li> <li>• Other.</li> <li>• None.</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response(s) to identify the relevant feature(s) included in the Affiliate’s overdraft program.</p> <div style="border: 1px solid black; background-color: #fff9c4; padding: 5px; margin: 5px 0;"> <p><b>NOTE:</b> The picklist options <b>should not include a “None” option</b>. If it does, do not select this option in response to question PM-A26.5. If “None” is selected, the response <b>will not allow the page to be saved</b>.</p> </div>			
<b>Field</b>	<b>PM-A26.5a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	<p>If “Other,” describe the feature included in the Affiliate’s overdraft program.</p>		
<b>Response</b>	<p>Provide narrative.</p>		
<b>Response Instruction(s)</b>			
<p>If “Other” was selected in PM-A26.5, describe the “other” feature included in the Affiliate’s overdraft program.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>An Applicant must convey the eligibility determinations approved by the CDFI Fund via Section Zero.</p>			
<b>Field</b>	<b>PM-A27</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p>For any of the Affiliate’s depository accounts, is the account holder subject to any potential nonsufficient funds (NSF) fees?</p>		
<b>Response</b>	<p>Yes, No, or N/A-Entity does not engage in any eligible Financial Services activity.</p>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether for any of the Affiliate’s depository accounts the account holder is subject to any potential nonsufficient funds (NSF) fees.</p>			

<b>If “Yes,” proceed to question PM-A27.1 through PM-A27.6</b>			
<b>Field</b>	<b>PM-A27.1</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Specify the highest dollar amount charged for such a fee.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Enter the highest dollar amount that might be charged for any nonsufficient funds fee.			
<b>Field</b>	<b>PM-A27.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Can such fees exceed the amount of the item returned unpaid?		
<b>Response</b>	Yes or No.		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether any nonsufficient funds fees might exceed the amount of the item returned unpaid.			
<b>Field</b>	<b>PM-A27.2a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	<b>If “Yes,”</b> Describe why such fees should be considered reasonable and proportionate to the amount of the item being returned unpaid and consistent with an acceptable community development mission.		
<b>Response</b>	Provide narrative.		
<b>Response Instruction(s)</b>			
Describe why NSF fees in excess of the amount of the item returned unpaid should be considered reasonable and proportionate to the amount of the item being returned unpaid and consistent with an acceptable community development mission.			
An Affiliate that charges NSF fees in excess of the amount of the item returned unpaid may be determined to be ineligible for CDFI Certification.			
<b>[CLARIFYING UPDATE 07/05/2025]</b>			
Applicants should describe how its Affiliate mitigates the risks associated with NSF fees and limit their occurrence. Examples effective actions include, but are not limited to:			
<ul style="list-style-type: none"> <li>• Monitoring accounts for excessive NSF fees and contacting affected customers to discuss affordable alternatives such as a linked savings accounts or low-cost loans, safe and affordable small-dollar loans, while allowing customers to choose their options.</li> <li>• Offering free or low-cost financial education workshops or personalized counseling to consumers with excessive or chronic incurrence of NSF fees</li> </ul>			

<ul style="list-style-type: none"> <li>• Reviewing notification practices related to NSF transactions to help customers avoid multiple fees and restore account balances.</li> <li>• Taking corrective action when NSF fee issues arise, including providing restitution to affected customers, as outlined in the FDIC’s 2022 “Supervisory Guidance on Multiple Re-Presentation NSF Fees” (FIL-40-2022).</li> <li>• Implementing additional consumer protection features as listed in PM-A27.6.</li> </ul>			
<b>Field</b>	<b>PM-A27.3</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Specify any <i>daily</i> limits on the number and frequency of such fees that can be charged to an account holder.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Identify any <i>daily</i> limits on the number and frequency of the NSF fees that can be charged to an account holder.			
<b>Field</b>	<b>PM-A27.4</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Can such fees be charged more than once for the same transaction, regardless of whether the item is re-presented?		
<b>Response</b>	Yes or No.		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether NSF fees can be charged more than once for the same transaction, regardless of whether the item is re-presented.			
<b>Field</b>	<b>PM-A27.4a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	<b>If “Yes,”</b> describe why such fees should be considered consistent with an acceptable community development mission.		
<b>Response</b>	Provide narrative.		
<b>Response Instruction(s)</b>			
<p><b>If “Yes” to PM-A27.4,</b> fully describe why charging NSF fees more than once for the same transaction, regardless of whether the item is re-presented, should be considered consistent with an acceptable community development mission.</p> <p>An Affiliate that charges NSF fees more than once for the same transaction may be determined to be ineligible for CDFI Certification.</p>			

**[CLARIFYING UPDATE 07/05/2025]**

Applicants should describe how its Affiliate mitigates the risks associated with NSF fees and limit their occurrence. Examples effective actions include, but are not limited to:

- Monitoring accounts for excessive NSF fees and contacting affected customers to discuss affordable alternatives such as a linked savings accounts or low-cost loans, safe and affordable small-dollar loans, while allowing customers to choose their options.
- Offering free or low-cost financial education workshops or personalized counseling to consumers with excessive or chronic incurrence of NSF fees
- Reviewing notification practices related to NSF transactions to help customers avoid multiple fees and restore account balances.
- Taking corrective action when NSF fee issues arise, including providing restitution to affected customers, as outlined in the FDIC’s 2022 “Supervisory Guidance on Multiple Re-Presentment NSF Fees” (FIL-40-2022).
- Implementing additional consumer protection features as listed in PM-A27.6.

<b>Field</b>	<b>PMA-27.5</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Specify any <i>annual</i> limits on the number and frequency of such fees that can be charged to an account holder.		
<b>Response</b>	Enter number.		
<b>Response Instruction(s)</b>			
Identify any <i>annual</i> limits on the number and frequency of the NSF fees that can be charged to an account holder.			
<b>Field</b>	<b>PM-A27.6</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Select each of the listed features included in the Applicant’s NSF policies.		
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• Balance-related alerts offered.</li> <li>• Access to real-time or near real-time balance information provided.</li> <li>• NSF fees collected from a consumer’s next deposit only after other items have been posted or cleared.</li> <li>• Consumer’s checking account linked to another account for NSF protection.</li> <li>• No transfer fees on NSF transfers from savings or from a credit account.</li> <li>• Other.</li> <li>• None.</li> </ul>		

Response Instruction(s)			
Select the appropriate response(s) to identify any feature(s) included in the Affiliate’s NSF policies.			
Field	PM-A27.6a	Field Type	Text
Field Label/Question Text	If “Other,” describe the feature included in the Affiliate’s NSF policies		
Response	Provide narrative.		
Response Instruction(s)			
If “Other” to PM-A27.6, describe the “other” feature included in the Affiliate’s NSF policies.			

## 5.6. Financing Entity

### 5.6.1. Applicant Only – Financing Entity- General Information

#### **CDFI Certification Financing Entity Requirements**

The CDFI Program interim regulations (12 CFR 1805.201(b)(2)) state that “a CDFI shall be an entity whose predominant business activity is the provision, in arm’s-length transactions, of Financial Products or Financial Services.”

Except as allowed in connection with certain CDFI Certification provisions (e.g., certain depository institutions, DIHC(s) that do not engage in their own direct Financial Products activity, entities seeking CDFI Certification solely for participation in the CDFI Fund’s Bond Guarantee Program or, in connection with the submission of the CDFI Certification Application only, Spin-off entities), **to meet the CDFI Certification Financing Entity requirements, an entity must demonstrate that:**

- The predominance of its assets is derived from or dedicated to eligible Financial Products or eligible Financial Services activity. The predominance of its staff time (including, as needed, or wanted, volunteer, contracted, or shared staffing) is dedicated to eligible Financial Products or eligible Financial Services activity.
- It has been engaged in eligible Financial Products or eligible Financial Services activity for at least one full 12-month fiscal year, meaning that it must have closed at least one eligible Financial Products transaction or have provided at least one eligible Financial Service on or before the first day of its most recently completed full 12-month fiscal year.
- It has or will have access to sufficient capital to close at least one new typical eligible Financial Products transaction within the upcoming three full calendar months (for CDFI Certification Applicants, this is within the three full calendar months immediately following the date the CDFI Certification Application is submitted).

<b>NOTE</b>	<p>For information on what constitutes eligible Financial Products or eligible Financial Services activity or an eligible Financial Products transaction or an eligible Financial Service, see the <a href="#">Key Terms</a> section of this guidance.</p> <p>Predominance does not require a majority, but occurs when an amount is the greatest as compared to all other amounts. To be predominant, the eligible Financial Products or eligible Financial Services activity does not have to constitute most of an entity’s overall activity, but it must be the type of activity that reflects the greatest use of its assets and staff time when compared separately and individually to each other’s separate and distinct activity type in which the entity engages. No other single activity type should claim more of an entity’s assets or its staff time than its eligible Financial Products or eligible Financial Services activity.</p>
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Once an entity is a Certified CDFI, if the predominant use of either its assets or staff time during a given fiscal year is something other than an eligible Financial Products or eligible Financial Services activity, the CDFI Fund may allow that entity to maintain its CDFI Certification by demonstrating compliance with the predominance test over a three-year fiscal period ending with the last day of its most recently completed fiscal year.

### **Financing Entity and Entities Using CDFI Certification Solely for Participation in the CDFI Fund's BG Program**

To qualify under this provision, an entity must demonstrate that either a) itself, or (for DIHCs that do not engage in direct eligible Financial Products activity) at least one entity relevant to its CDFI Certification collective review process, or b) Controlling Certified CDFI has engaged in eligible Financial Products or eligible Financial Services activity for at least one full 12-month fiscal year. This means that the relevant entity must document having closed at least one eligible Financial Products transaction or provided at least one eligible Financial Service on or before the first day of its most recently completed full 12-month fiscal year.

#### ***Special Considerations for DIHCs and Controlling Certified CDFIs***

- For DIHCs that do not engage in their own direct eligible Financial Products or eligible Financial Services activity and rely on a related entity to meet the 12-month requirement, the related entity's own fiscal year timeframe will be used for the test—even if it differs from that of the DIHC seeking CDFI Certification.
- If an entity relies on a Controlling Certified CDFI to meet the 12-month requirement, the Controlling Certified CDFI's fiscal year timeframe will be used for the test—even if it differs from that of the DIHC seeking CDFI Certification.

#### ***Use of Eligible Financial Products or Services Activity***

Entities seeking CDFI Certification solely for participation in the CDFI Fund's BG Program and that are Controlled by a Certified CDFI may satisfy CDFI Certification requirements using:

- Eligible Financial Products activity involving Financial Products offered to a Controlling Certified CDFI, as long as the entity is named as a financing entity of record in the associated transaction closing documents; or
- Non-arm's-length financial services activity directed to a Controlling Certified CDFI, provided that:
  - The activity is conducted pursuant to operating agreements that include management and ownership provisions; and
  - The agreements are in a form and substance acceptable to the CDFI Fund (see 12 CFR 1805.201(b)(2)(C)(iii)).

## **Financing Entity and Certain Depository Institutions**

The following entity types are presumed to meet all of the CDFI Certification Financing Entity requirements, except for the requirement related to having been engaged in eligible Financial Products or eligible Financial Services activity for at least one full 12 month fiscal year:

- Depository Institution Holding Companies (DIHC[s]);
  - DIHC(s) that do not engage in their own direct eligible Financial Products or eligible Financial Services activity must rely on an entity relevant to their CDFI Certification collective review process to meet the standard that eligible Financial or eligible Financial Services activity had begun on or before the first day of the most recently completed full 12 month fiscal year. The relevant related entity’s own fiscal year timeframe will be used for the test, even if that timeframe is different from that of the DIHC seeking to obtain or maintain CDFI Certification.
- Insured Depository Institutions (IDI[s]) – depository institutions with FDIC deposit insurance;
- Insured Credit Unions (ICU[s]) – depository Institutions with NCUA share insurance; ***and***
- State-Insured Credit Unions (includes State-regulated credit unions; SICU[s]).



Banks/thrifts that are not FDIC-insured are not currently presumed to meet the CDFI Certification Financing Entity requirements and must provide all relevant information to demonstrate that they meet those standards.

To be accepted as meeting the CDFI Certification Financing Entity requirement related to having been engaged in eligible Financial Products or eligible Financial Services activity for at least one full 12 month fiscal year, a DIHC, IDI, ICU, or SICU must be able to demonstrate that it (or for DIHC[s] that do not engage in their own direct eligible Financial Products activity, at least one entity relevant to their CDFI Certification collective review process) has engaged in eligible Financial Products or eligible Financial Services activity for at least one full 12 month fiscal year. Thus, the relevant entity must be able to document that it has closed at least one eligible Financial Products transaction or have provided at least one eligible Financial Service on or before the first day of its most recently completed full 12 month fiscal year.

DIHC(s), IDI(s), ICU(s), and SICU(s) that meet the length of time engaging in eligible Financial Products or eligible Financial Services activity requirement and can therefore be presumed to meet the CDFI Certification Financing Entity requirements, do not have to complete the Financing Entity section of the CDFI Certification Application.

## **Financing Entity and CDFI Certification Provision for Spin-off Entities**

For information on eligibility for the CDFI Certification Spin-off provision, see the information on [“Spin-off Entities”](#) in the CDFI Certification Requirements and Provisions by Entity Type section of this guidance.

An entity using the CDFI Certification Spin-off provision does not have to meet the CDFI Certification Financing Entity requirement related to the length of time that eligible Financial Products or eligible Financial Services activity has been underway. However, it must have a Spin-off-related Affiliate that closed, at arm’s-length and as a financing entity of record in the associated transaction closing

documents, at least one transaction involving a Financial Products included in a portfolio of Financial Products transactions transferred to the Spin-off (not purchased) by that particular Affiliate that is of the same type and purpose as one of the Spin-off offers on or before the first day of the 12 full calendar months completed immediately prior to the relevant Financial Products portfolio transfer date.

For the purposes of the CDFI Certification Financing Entity test, an entity using the CDFI Certification Spin-off provision should include as part of its overall eligible Financial Products and Financial Services activity asset amounts, all assets that appear on its own, non-consolidated balance sheet. The assets should include any transferred assets that meet the following conditions:

- Transfers from an eligible Spin-off-related entity, that are dedicated to Applicant's eligible Financial Products or eligible Financial Services activity; or
- Transfers derived from a Financial Products transaction(s) closed at arm's-length where the financing entity of record in associated transaction closing documents is an eligible Spin-off-related Affiliate or an eligible Spin-off-related Affiliate's eligible Financial Services activity.

### **Financing Entity and Eligible Financial Products and Eligible Financial Services Activity**

Entities must use only eligible Financial Products and eligible Financial Services activity to demonstrate compliance with the CDFI Certification Financing Entity requirements. Information on what constitutes eligible Financial Products or eligible Financial Services activity is provided in the [Key Terms](#) section of this guidance document.

Entities that are not solely focused on eligible Financial Products or eligible Financial Services activity and have other activity types in which they engage. To properly present status information in connection with the CDFI Certification Financing Entity tests, an entity must be able to identify the broad activity types in which it engages, as well as to distinguish between and measure how it allocates resources to support those different activity types. To do this, an entity must be able to determine what activity it engages in that qualifies as Financial Products and eligible Financial Services activity because it involves the direct delivery of eligible Financial Products transactions or eligible Financial Services for which the entity claiming the activity is a financing entity of record versus what activity it engages in, including non-eligible financing activity, that does not involve the direct delivery of eligible Financial Products transactions or eligible Financial Services.

Examples of broad activity types that an entity might engage in other than eligible Financial Products or eligible Financial Services activity include real estate development, non-eligible financing activity, social services, community planning, cultural programming, etc.

### ***Obtaining Determination to Include New Financing Product Type(s) or Financing Service Type(s) as Eligible Financial Product(s) or Eligible Financial Service(s)***

If an entity wants to include any financing product or service not currently recognized by the CDFI Fund as an eligible Financial Products or eligible Financial Service in order to count related activity as eligible Financial Products or eligible Financial Services activity for the purpose of meeting any of the CDFI

Certification requirements, it must obtain prior approval from the CDFI Fund. Prior approval must be received before the CDFI Certification Application is submitted. Please see [“Obtaining Determination to Include New Financing Product Type\(s\) or Financing Service Type\(s\) as Eligible Financial Product\(s\) or Eligible Financial Service\(s\)”](#) in the “Obtaining CDFI Certification-Related Determinations on New Financial Products Type(s), New Financial Services Type(s), Amended Responsible Financing Practice(s),

New Disregarded or Included Major Use(s) of Assets/Staff Time, New Targeted Population(s), and New/Amended CDFI Certification Target Market Assessment Methodology(ies)” section of this guidance for more information on the relevant approval process.

### **Financing Entity and Assets Dedicated to or Derived from Eligible Financial Products or Eligible Financial Services Activity**

Unless otherwise directed, information on the amount of an entity’s assets currently dedicated to or that were derived from eligible Financial Products or eligible Financial Services activity or are available within the next three months to finance Financial Products closings, must be based on assets held directly by that entity separately and independently from all other entities (including parent entities and other Affiliates) as of its current fiscal year to date.

A current fiscal year to date balance sheet showing non-consolidated information on assets held by the entity seeking to obtain or maintain CDFI Certification separately and independently from any other entity (i.e., that reflects the entity’s financial position on its own, excluding all other entities such as Affiliates or entities that share its EIN) must be available to document its asset status. The balance sheet does not need to be audited or third-party reviewed, but it must be presented in a generally accepted format.



#### **[CLARIFYING UPDATE 07/05/2025]**

The “current fiscal year to date as of date” used to determine an entity’s asset status must not be more than 45 days prior to the CDFI Certification Application submission date. In other words, the “current fiscal year as of date” using the current fiscal year can not be more than 45 days prior to the CDFI Certification Application submission date. For example, if an entity plans to submit their CDFI Certification Application on September 14, 2025, and their fiscal year end is December 31<sup>st</sup>, then their 45 day time period for the current fiscal year ranges from August 1, 2025 to September 14, 2025 because there are 31 days in August plus 14 days to get to September 14<sup>th</sup>. If an entity is less than 45 days into its current fiscal year, then the earliest “current fiscal year to date as of date” for the asset information and the related balance sheet will be less than 45 days old, as it cannot be a date prior to the start of the current fiscal year. All dates are based on Eastern time (i.e., the Eastern time submission time stamp on the Application will be used to determine its submission date).

#### **[CLARIFYING UPDATE 07/05/2025]**

If an entity seeking to obtain or maintain CDFI Certification uses consolidated asset information to assess the level of assets dedicated to eligible Financial Products or eligible Financial Services activity and it uses information and provides a balance sheet that shows its assets separately and distinctly from all other Affiliated entities for an appropriate as of date, any asset or asset-related status information it provides to the CDFI Fund for CDFI Certification-purposes will be considered invalid.

**Assets dedicated to or derived from eligible Financial Products or eligible Financial Services activity include:**

- The portion of any assets held directly by an entity, as reflected in its current fiscal year-to-date balance sheet, that are derived from or available to be used as capital to finance its eligible Financial Products transaction closings;
- The portion of any assets held directly by an entity, as reflected in its current fiscal year-to-date balance sheet, that are derived from or are available to support the direct provision of eligible Financial Services; ***or***
- The portion of any assets held directly by an entity, as reflected in its current fiscal year-to-date balance sheet, that are available to support its staffing and other administrative or operating costs related to its eligible Financial Products or eligible Financial Services activity (administrative and operating costs include expenses such as marketing, occupancy, etc.).

Consistent with CDFI Program interim regulations (12 CFR 1805.201(b)(2)), the CDFI Fund does not generally consider assets (or staff time) dedicated to activities, including, but not limited to those listed below, that support eligible Financial Products or eligible Financial Services activity. Assets (or staff time) dedicated or derived from such activity cannot, without special approval from the CDFI Fund, be counted as assets (or staff time) dedicated to or derived from eligible Financial Products or eligible Financial Services activity:

- Real estate development
- Property management
- Non-eligible financing activity, such as:
  - The provision of financing products or services not accepted by the CDFI Fund as eligible Financial Products or eligible Financial Services types or that are provided in a way that prevents the activity from being accepted as eligible Financial Products or eligible Financial Services activity (see key terms for more information on eligible Financial Products and Financial Services types/activities);
  - Grant making;
  - Financial Products packaging, origination, or servicing for financing provided by other entities; ***or***
  - Financing for Affiliated parties (unless the relevant entity is using a CDFI Certification provision for participants in the CDFI Fund's Bond Guarantee Program, in which case eligible Financial Products or eligible Financial Services activity directed to a Controlling Certified CDFI is acceptable).
- The provision of Development Services
- Other non-financing activities such as social services, community planning, and cultural programming

For information on how to request approval to add to a major use(s) of an asset(s) or staff time to those that are eligible to be included (or disregarded) for purposes of the CDFI Certification Financing Entity predominance test, please see "[Obtaining Determination to Add Major Use\(s\) of Assets or Staff Time Eligible to Be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests](#)" in

the “Obtaining CDFI Certification-Related Determinations on New Financial Products Type(s), New Financial Services Type(s), Amended Responsible Financing Practice(s), New Disregarded or Included Major Use(s) of Assets/Staff Time, New Targeted Population(s), and New/Amended CDFI Certification Target Market Assessment Methodology(ies)” section of this guidance.

### **Financing Entity and Staff Time Dedicated to or Derived from Eligible Financial Products or Eligible Financial Services Activity**

Information on the amount of overall staff time available to an entity and that it dedicates to eligible Financial Products or eligible Financial Services activity must be based on just its own staffing levels and activities. It must not include staff time dedicated to the activities of another entity, even if that other entity is linked to it somehow, perhaps as an Affiliate or community partner (i.e., staff time spent on activity that will be claimed as having been carried out by or for any other entity, such as an Affiliate or a community partner, must not be included in the staffing data used to assess compliance with the CDFI Certification Financing Entity requirements).

Available staff time can include volunteer personnel and staffing provided by another entity or consultants when the relevant staff that supports the entity’s day-to-day activity. Staffing provided by another entity can include contracted staff or staff shared by/with that other entity. For any staffing provided by or shared with another entity, only the portion of an individual’s time spent on activity specifically undertaken on behalf of and that will be solely attributed to the entity seeking to obtain or maintain CDFI Certification can be included as part of its available staff time.

The amount of staff time an entity counts as dedicated to each different broad activity type in which it engages must reflect the way that entity used its staff time during the most recently completed 12 full calendar months. The entity must determine the typical total FTE staff time available to it during the most recently completed 12 full calendar months and identify how that time was allocated to each relevant activity type.

Examples of uses of staff time that may be included as part of the staff time an entity classifies as being dedicated to its eligible Financial Products or eligible Financial Services activity include:

- General entity administration that supports an entity’s direct engagement as a financing entity of record in eligible Financial Products or eligible Financial Services activity;
- Direct staffing for eligible Financial Products or eligible Financial Services activity that an entity engages in as a financing entity of record;
- Marketing and outreach for eligible Financial Products or eligible Financial Services activity that an entity engages in as a financing entity of record; ***and***
- Fundraising/raising capital for the eligible Financial Products or eligible Financial Services that an entity engages in as a financing entity of record.

See the list of activities, including real estate development and grant making, that appears just above under “Financing Entity and Assets Dedicated to or Derived from Eligible Financial Products or Eligible Financial Services Activity” for information on uses of staff time that would not generally be accepted as relevant to eligible Financial Products and/eligible Financial Services activity.

## **Predominance as a Financing Entity**

To pass the CDFI Certification Financing Entity predominance test, an entity's assets and staffing information must demonstrate that eligible Financial Products or eligible Financial Services activity is its predominant business activity.

To be predominant, eligible Financial Products or eligible Financial Services activity does not have to constitute the majority of an entity's overall activity, but it must be the activity type that reflects the greatest use of its assets and staff time when compared separately and individually to any other separate and distinct activity in which the entity engages. No other single activity type should claim more of an entity's assets or its staff time than its eligible Financial Products or eligible Financial Services activity.

All assets held directly by an entity, as of its current fiscal year to date, and all of its available staff time, as estimated based on a typical week during the most recent 12 full calendar months, including any assets or staff time that are not relevant to the conduct of the entity's eligible Financial Products or eligible Financial Services activity, must be taken into consideration for the purposes of the CDFI Certification Financing Entity predominance test.

### **[CLARIFYING UPDATE 07/05/2025]**

#### ***Certain Federal, State government, or Municipal Grants and Predominance***

An Applicant or Certified CDFI may disregard grant funds provided through a Federal, State government, or municipal community development-focused or public assistance program for the purposes of the Financing Entity predominance test if the following conditions are met:

- The majority of the funds were awarded to the Applicant/Certified CDFI for a community development, public assistance, or other purpose approved by the CDFI Fund.
- The grant funds are intended for and are ultimately delivered to an approved Target Market or Eligible Market in the form of grants, Financial Products and/or Financial Services, or other acceptable form of assistance or support as approved by the CDFI Fund.

If these conditions are met, grant funds received in a specific fiscal year may be disregarded for the next two subsequent fiscal years that serve as the basis for the relevant Financing Entity criteria review. For example, funds received in FY 2023 can be disregarded as financing activity for FYs 2023, 2024, and 2025, for a total of three fiscal years. All disregarded funds are subject to final approval by the CDFI Fund.

The CDFI Fund may grant an extension to the three-year period in the case of a Federal or Presidential declared disaster. Although these funds may be disregarded for the purposes of the Financing Entity test, Certified CDFIs must still report on their grant making activities annually in the ACR.

#### ***For the CDFI Certification Financing Entity Predominance Test***

### **[CLARIFYING UPDATE 07/05/2025]**

- An entity must identify, in the form of a dollar amount, the overall total assets that it holds on its own separately and distinctly from any other entity per a current fiscal year to date balance sheet (with an as of date from within the current fiscal year that is no more than 45 days old) that shows its asset levels separately from all other entities, including an Affiliate(s). The "current fiscal year to

date as of date” used to determine an entity’s asset status must not be more than 45 days prior to the CDFI Certification Application submission date. For example, if an entity plans to submit their CDFI Certification Application on September 14, 2025, and their fiscal year end is December 31<sup>st</sup>, then their 45 day time period for the current fiscal year ranges from August 1, 2025 to September 14, 2025 because there are 31 days in August plus 14 days to get to September 14<sup>th</sup>. If an entity is less than 45 days into its current fiscal year, then the earliest “current fiscal year to date as of date” for the asset information and the related balance sheet will be less than 45 days old, as it cannot be a date prior to the start of the current fiscal year. All dates are based on Eastern time (i.e., the Eastern time submission time stamp on the Application will be used to determine its submission date).

- An entity must identify the overall total FTE staff time typically available to it separately and distinctly from any other entity in the form of the total number of FTE(s) available to it as indicated by an assessment of the typical number of FTE(s) available to it during the most recent 12 full calendar months. Staff time must be identified in the form of Full Time Equivalent (FTE) staff time, not based on the number of staff members.
  - A single full-time staff member represents an FTE of one (1), while a part-time staff member represents a fractional FTE value of less than one which will vary based on the number of hours they work. For example, if the full-time work week is 40 hours and a position for a part-time staff member is set at 10 hours per week, the staff member in that part-time position has an FTE value of .25 (or one quarter of the FTE time represented by the full-time worker).
  - To calculate an entity’s typical available FTE staff time for CDFI Certification purposes:
    - Determine how much staff time was typically available to that entity, separately and distinctly from all other entities, to conduct its activities over the course of the most recent 12 full calendar months.
    - For example, if during the most recent 12 full calendar months an entity typically had one full-time 40 hour per week staff member and one part-time 10 hour per week volunteer that it counted among its staffing, the typical amount of staff time available to it would be 50 hours weekly and 2,600 hours annually (the annual figure is the weekly figure multiplied by 52 weeks).
    - Divide the total number of typically available staff hours by the amount of time that would be worked by a full-time employee during whatever timeframe the hours represent.

Total of all staff hours available during a particular timeframe / number of hours that would be worked by a full-time staff member for the relevant timeframe (e.g., if full-time staff work 40 hours per week, this would be 2,080 if an annual timeframe is being used is a year, 240/248 if a monthly timeframe is being used or 8 if daily hours are being used) = Final FTE.

If the typically available staff hours reflect a week’s worth of available staff time and the full-time work week is 40 hours, divide the total available weekly hours by 40. If the typically available hours represent a year’s worth of available staff time and the full-time work week is 40 hours divide the total available annual hours by 2,080 (which is the amount of time a 40-hour per week full-time staff member works annually).

**EXAMPLE:** Using the one 40 hour per week staff member and one part-time 10 hour per week volunteer example from above, the calculations would be:

- Typical available FTE(s) based on typical weekly available staff time: **40 + 10** (the 40 full-time plus the 10 part-time staff hours) **divided by 40** (the number of hours in the full-time work week) = **50 divided by 40 = 1.25 FTE(s)**.
- Typical available FTE(s) based on typical annual available staff time: **2,600** (50 hours of typical weekly staff time multiplied by 52 weeks) **divided by 2,080** (the number of hours in the full-time work year) = **1.25 FTE(s)**.
- An entity must identify the amount of its overall total assets and average annual FTE staff time that are connected to each different broad type of activity in which it engages. The assets will be assigned to each different broad activity type based on the portion, in dollars, of the assets that show in the acceptable current fiscal year to date balance sheet that are dedicated to or derived from each relevant activity type. The staff time will be assigned based on the average amount of the overall total number of annual FTE staff time that are dedicated to each relevant activity type.

The level of an entity's assets and staff time categorized as relevant to the conduct of its eligible Financial Products or eligible Financial Services activity will then be compared one by one to the level of assets and staff time assigned to each other's broad activity type in which the entity engages to see if the eligible Financial Products or eligible Financial Services activity type is the one to which the greatest amount of the entity's assets and staff time are assigned. Entities that engage in eligible Financial Products or eligible Financial Services activity may also have an asset use(s) or a staff time use(s) that does not currently qualify as a use/purpose/activity relevant to the conduct of eligible Financial Products or eligible Financial Services activity. As a result, their asset or staffing data might be skewed such that the direct provision of eligible Financial Products transactions or of an eligible Financial Services does not appear to be their predominant activity.

If a particular use(s) of an asset(s) or staff time is currently eligible as one that the CDFI Fund allows to be disregarded for the purposes of the CDFI Certification Financing Entity predominance test (see the list below), an entity can treat an asset(s) or staff time used in one of the recognized ways as a disregarded asset(s) or as disregarded staff time without any special approval from the CDFI Fund. For CDFI Certification Applicants, an asset(s) or staff time of this type will be identified in the Financing Entity section of the Application as disregarded.

Entities may also request that a particular use(s) of an asset(s) or of its staff time that is not currently eligible as a use that can be disregarded for the purposes of the CDFI Certification Financing Entity predominance test be recognized as such or they may request that a use(s) be approved to be included as a use(s) of an asset(s) or staff time relevant to the conduct of eligible Financial Products or eligible Financial Services activity. CDFI Certification Applicants making either of these types of requests must do so before submitting their CDFI Certification Application (see "[Obtaining Determination to Add Major Use\(s\) of Assets or Staff Time Eligible to be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests](#)").

When requesting that a use(s) of an asset(s) or a use(s) of staff time be excluded from determination for the CDFI Certification Financing Entity predominance test via the "[Obtaining Determination to Add Major Use\(s\) of Assets or Staff Time Eligible to Be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests](#)" process, an entity must provide an explanation of why such assets or staff time incorrectly appear to indicate that the entity is not predominantly a financing entity. When

requesting that a use(s) of an asset(s) or use(s) of staff time be included and accepted as relevant to eligible Financial Products or eligible Financial Services activity, an entity must explain why the use(s) is essential for it to conduct its eligible Financial Products or eligible Financial Services activity. The CDFI Fund maintains sole discretion to determine the applicability of such assets or staff time in meeting the Financing Entity test.

The types of major assets, uses of assets, or activities that the CDFI Fund currently allows to be disregarded for the purposes of the CDFI Certification Financing Entity predominance test, along with relevant conditions that must be met, include:

- Endowments held by an entity that has acted as a traditional foundation but that has shifted their activities and staff time to conduct more eligible Financial Products activity than grant activity
- Real property held by an entity because it owns its own building(s) where a percentage of the building(s) supports the conduct of eligible Financial Products or eligible Financial Services activity
- Real property held by an entity because it was donated that the entity intends to sell within the next fiscal year and some or all of the revenue raised will be used to support the conduct of eligible Financial Products or eligible Financial Services activity
- Real estate to be sold or transferred to non-Affiliated third parties in order to support real estate development financing conducted as eligible Financial Products activity (eligible Financial Products for real estate development must be offered)
- Assets or staff time dedicated to the provision of Development Services

***Obtaining Determination to Add Major Use(s) of Assets or Staff Time Eligible to Be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests***

Entities that seek to disregard as irrelevant or include as acceptable any major use(s) of an asset(s) or staff time not currently eligible to be disregarded or included for the purposes of determining whether an entity is predominantly engaged in eligible Financial Products or eligible Financial Services activity in connection with the CDFI Certification Financing Entity requirements must obtain a determination from

the CDFI Fund allowing the change before the related assets or staff time may be disregarded or included for the purposes of the Financing Entity predominance test. For CDFI Certification Applicants, approval of any such change must be received before the CDFI Certification Application is submitted.

For information on how to request approval to add to a major use(s) of an asset(s) or staff time to those that are eligible to be disregarded or included for purposes of the CDFI Certification Financing Entity predominance test, please see [“Obtaining Determination to Add Major Use\(s\) of Assets or Staff Time Eligible to be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests”](#) in the “Obtaining CDFI Certification-Related Determinations on New Financial Products Type(s), New Financial Services Type(s), Amended Responsible Financing Practice(s), New Disregarded or Included Major Use(s) of Assets/Staff Time, New Targeted Population(s), and New/Amended CDFI Certification Target Market Assessment Methodology(ies)” section of this guidance.

### **Financing Entity and Length of Time for Eligible Financial Products and/Eligible Financial Services Activity**

To meet the requirement that eligible Financial Products or eligible Financial Services activity has been conducted for at least one full 12 month fiscal year, an entity must, except as allowed in connection with certain CDFI Certification provisions (e.g., DIHC[s] that do not engage in their own direct Financial Products activity, entities seeking CDFI Certification solely for participation in the CDFI Fund's Bond Guarantee Program or, in connection with the submission of the CDFI Certification Application only, Spin-off entities) be able to show that it closed at least one eligible Financial Products transaction or provided at least one eligible Financial Service on or before the first day of its most recently completed full 12 month fiscal year.

There must be documentation evidencing the eligible Financial Products transaction closing date or the eligible Financial Service provision date.

### **Financing Entity and Sufficient Capital to Continue Eligible Financial Products Activity**

An entity seeking to obtain or maintain CDFI Certification must have access to sufficient capital to sustain its eligible Financial Products activity. Generally, the CDFI Fund deems that an entity has sufficient capital to continue closing eligible Financial Products transactions if it has, or will have access to, enough capital to close as a financing entity of record in the associated transaction closing documents at least one new eligible Financial Products transaction within the upcoming three full calendar months in a dollar amount that is typical for the relevant entity based on its Financial Products offerings.

An entity's typical eligible Financial Products transaction amount will be calculated as the average dollar amount of all eligible Financial Products transactions it closed over the most recent 12 full calendar months or, if it is using the CDFI Certification Spin-off provision, as the average dollar amount of all eligible Financial Products transactions closed by the Spin-off itself during the most recent 12 full calendar months, along with all Financial Products transactions included in a transferred Financial Products portfolio received from all eligible Spin-off-related Affiliates that were closed by the transferring Affiliate(s) at arm's-length and as a financing entity of record in the associated transaction closing document during the most recent 12 full calendar months.

For CDFI Certification Applicants, the relevant upcoming three full calendar month timeframe is based on the date of submission of the CDFI Certification Application, as is the relevant most recent 12 full calendar month timeframe.

An entity can rely on on-balance sheet or off-balance sheet resources to demonstrate that it has sufficient capital to continue its eligible Financial Products transaction closings. Any available liquid assets must be substantiated by a current fiscal year-to-date balance sheet for the relevant entity that shows its asset information separately and distinctly from all other entities and has an as of date from within the current fiscal year that is no more than 45 days old. There must also be documentation that verifies the availability of any off-balance sheet sources of capital. Examples of acceptable documentation of off-balance sheet capital include: for a line of credit, proof of commitment and of the recent available balance from the lender; for grant or loan funds committed, but not yet received, a formal commitment letter from the funder or lender; for capital held by an Affiliate, proof of the commitment signed by an Authorized Representative of the Affiliate.

Types of capital that should not be included as available to an entity to finance its eligible Financial Products transaction closings include, but are not limited to, cash needed for operations and cash or other liquid assets that have been earmarked, set aside, or board- or funder-designated for activity other than eligible financing. This may include, but is not limited to, capital designated for financing products or services not approved by the CDFI Fund as eligible Financial Products or Financial Services; grant making; real estate development; property management; and land acquisition. Capital not currently available to an entity that is expected to become available later (e.g., from loan repayments, a grant, etc.), but not within the upcoming three full calendar months should not be counted as being available to finance its eligible Financial Products transaction closings.

**Completing the CDFI Certification Application Financing Entity Section**

To complete the Financing Entity section of the CDFI Certification Application, an Applicant will:

- Review and, if needed, provide or correct any information intended to be auto populated into the CDFI Certification Application Financing Entity section fields.
- Complete the non-auto populated Financing Entity section field(s).
- Attach copies of all required documentation.

<b>NOTE</b>	CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.
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**5.6.2. Applicant Only – Financing Entity- General Information**

**Applicant Only – Financing Entity – General Information – (FE-G) Data Fields**

<b>FE-G01</b>	If the Applicant has indicated that it is seeking to use the CDFI Certification BG Program provision.		
<b>Field</b>	<b>FE-G01.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Is the Applicant Controlled by a Certified CDFI that has a date of incorporation/organization/ establishment at least 12 full months prior to submission of this CDFI Certification Application?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant is Controlled by a Certified CDFI that has a date of incorporation/ organization/ establishment at least 12 full months prior to submission of this CDFI Certification Application.			

Field	FE-G01.2	Field Type	Picklist
Field Label/Question Text	Will the Applicant use Financial Product activity that is not arm’s-length to meet any of the Financing Entity requirements?		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p><b>Select “Yes”</b> only if the Applicant seeks to use a CDFI Certification provision for entities using the CDFI Certification solely for participation in the CDFI Fund’s BG Program and it will use non-arm’s-length Financial Products or Financial Services activity for which it is a financing entity of record in associated transaction closing documents that is directed to a Controlling Certified CDFI(s) to meet the CDFI Certification Financing Entity requirements.</p> <p>While the field label/question for this field indicates that the response should only address whether the Applicant will use non-arm’s-length Financial Products activity for which it is a financing entity of record in associated transaction closing documents and that is directed to a Controlling Certified CDFI(s) to meet the CDFI Certification Financing Entity requirements, the response should also address whether non-arm’s-length financial services provided directly by the Applicant to a Controlling Certified CDFI(s) will be used, as well.</p> <p>Only entities eligible for a CDFI Certification provision for entities that will use the CDFI Certification for the sole purpose of participating in the CDFI Fund’s BG Program may use non-arm’s-length Financial Products or Financial Services activity to meet the Financing Entity requirements and even they may only use non-arm’s-length activity that is directed to a Controlling Certified CDFI(s).</p> <p><b><u>Review the following information before completing this field:</u></b></p> <ul style="list-style-type: none"> <li>• Key Term – Arm’s-length</li> <li>• Key Term – Eligible Financial Products activity/transaction</li> <li>• Key Term – Eligible Financial Services activity/transaction</li> <li>• Provision for entities using the CDFI Certification solely for participation in the CDFI Fund’s Bond Guarantee Program</li> </ul>			
Field	FE-G02	Field Type	Picklist
Field Label/Question Text	Do the Applicant’s financial statements and current fiscal year-to-date balance sheets show assets held by the Applicant separately and independently from all other entities (i.e., in a non-consolidated manner)?		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the Applicant’s financial statements and current fiscal year-to-date balance sheet show financial information (including assets held by the Applicant) separately and independently from all other entities.</p>			

<p>The Applicant’s current fiscal year-to-date financial statement must show all assets held by the Applicant separately and independently from all other entities (i.e., that reflects the entity’s financial position on its own, excluding all other entities such as Affiliates or entities that share its EIN).                  If “No,” the Applicant is not eligible for Certification.</p>			
<b>Field</b>	<b>FE-G03</b>	<b>Field Type</b>	<b>Attachment</b>
<b>Field Label/Question Text</b>	Attach financial statements for Applicant’s most recently completed fiscal year with non-consolidated balance sheet information.		
<b>Response</b>	Attach required document(s).		
<b>Response Instruction(s)</b>			
<p>Attach the Applicant’s most recently completed fiscal year financial statements.</p> <ul style="list-style-type: none"> <li>• The financial statements can be consolidated but must show the Applicant’s financial information separately and distinctly from all other entities (i.e., that reflect the Applicant’s financial position on its own, excluding all other entities such as Affiliates); the Applicant’s entity name should show clearly in the document; and the financials must cover the correct most recently completed fiscal year timeframe.</li> <li>• Audited financial statements are not required for submission of the CDFI Certification Application. Nor are third party-reviewed financial statements. However, the financial information must be presented in a generally accepted format.</li> </ul> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div>			
<b>Field</b>	<b>FE-G04</b>	<b>Field Type</b>	<b>Attachment</b>
<b>Field Label/Question Text</b>	Attach financial statements with non-consolidated balance sheet information for Applicant’s current fiscal year-to-date.		
<b>Response</b>	Attach required document(s).		
<b>Response Instruction(s)</b>			
<p>Attach the Applicant’s current fiscal year-to-date financial statements.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>The “as of” date for the current fiscal year to date financial statements must be displayed on the financials and must be from within the current fiscal year and not be more than 45 days prior to the date of submission of the CDFI Certification Application, which is determined based on Eastern time (i.e., the Eastern time submission time stamp on the Application will be used to determine its submission date). If an entity is less than 45 days into its current fiscal year, then the earliest as of</p>			

date for the current fiscal year to date asset information will also be less than 45 days back, as it cannot be a date prior to the start of the current fiscal year.

The financial statements can be consolidated but must show the Applicant’s financial information separately and distinctly from all other entities (i.e., that reflect the Applicant’s financial position on its own, excluding all other entities such as Affiliates); the Applicant’s entity name should show clearly; and the financials must cover the correct current fiscal year to date timeframe.

Audited financial statements are not required for submission of the CDFI Certification Application. Nor are third-party reviewed financial statements. However, the financial information must be presented in a generally accepted format.

**NOTE:** CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.

### 5.6.3. Applicant Only – Financing Entity – Asset Predominance – Non-Consolidated Current Fiscal Year-To-Date Asset Data – FE-A01 through FE-A02

#### **Applicant Only - Asset Predominance – Non-Consolidated Current Fiscal Year-To-Date Asset Data –(FE-A01 to FE-A02) Data Fields**

<b>Field</b>	<b>FE-A01</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Applicant’s Total Assets		
<b>Response</b>	Enter only the Applicant’s current fiscal year-to-date total assets.		
<b>Response Instruction(s)</b>			
Enter the total assets, held by the Applicant only, per the current fiscal year-to-date balance sheet showing the Applicant’s assets separately and distinctly from all other entities.			
<b>Field</b>	<b>FE-A02</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant request that any of its assets (as indicated by the Applicant’s non-consolidated current fiscal year-to-date balance sheet) be disregarded for the purposes of the Financing Entity predominance test?		
<b>Response</b>	Yes or No		

Response Instruction(s)			
Select the appropriate response to indicate whether the Applicant has an asset(s) with a use that makes it eligible to be disregarded for the purposes of the Financing Entity predominance test.			
If “No,” skip to FE-A03			
Field	FE-A02.1	Field Type	Text
Field Label/Question Text	Identify the line item for the asset held by the Applicant in the non-consolidated current fiscal year-to-date balance sheet for which it requests that some or all of the related asset be disregarded.		
Response	Enter balance sheet line item name.		
Response Instruction(s)			
Enter the name of the balance sheet line item as it appears in the current fiscal year-to-date balance sheet showing the Applicant’s assets separately and distinctly from all other entities for an asset held by the Applicant some or all of which has a use that makes it is eligible to be disregarded.			
Field	FE-A02.2	Field Type	Picklist
Field Label/Question Text	Indicate how the asset is used that qualifies it to be disregarded.		
Response	Select one: <ul style="list-style-type: none"> <li>• Endowment.</li> <li>• Portion of owned building used to support the direct provision of Financial Products and/or Financial Services.</li> <li>• Donated real property to be sold within the next fiscal year to raise funds to support the direct provision of Financial Products and/or Financial Services.</li> <li>• Real estate to be sold/transferred to non-Affiliated third parties in order to support real estate development financing activity (Financial Products for real estate development must be offered).</li> <li>• Other.</li> </ul>		
Response Instruction(s)			
Select the appropriate response to indicate the use of the asset, some or all of which, has a use that makes it eligible to be disregarded for the purpose of the CDFI Certification Financing Entity predominance test.  If an entity has assets dedicated to Development Services, choose “Other” as the response option and then enter Development Services where asked to identify the asset use to be disregarded.			

<b>Field</b>	<b>FE-A02.2a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	If “Other,” identify the other asset use.		
<b>Response</b>	Enter use.		
<b>Response Instruction(s)</b>			
If “Other” is selected in FE-A02.2, indicate the particular use of the asset the Applicant seeks to have disregarded.			
<b>Field</b>	<b>FE-A02.2b</b>	<b>Field Type</b>	
<b>Field Label/Question Text</b>	Has this asset use been pre-approved by the CDFI Fund as one for which some or all of the assets used in that manner can be disregarded for the purposes of the CDFI Certification Financing Entity predominance test?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the “other” asset use has been pre-approved by the CDFI Fund via the <a href="#">“Obtaining Determination to Add Major Use(s) of Assets and/or Staff Time Eligible to be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests”</a> as one for which some or all of the asset(s) used in that manner are eligible to be disregarded for the purposes of the CDFI Certification Financing Entity predominance test.</p> <p>Select “Yes” only if the “Other” asset use is one for which the Applicant received an approval determination from the CDFI Fund via the <a href="#">“Obtaining Determination to Add Major Use(s) of Assets and/or Staff Time Eligible to Be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests”</a> process allowing it to be accepted as an asset use eligible to be disregarded for the purposes of the CDFI Certification Financing Entity Predominance test.</p> <p>If “No,” the asset will not be disregarded toward meeting the Financing Entity predominance test.</p>			
<b>Field</b>	<b>FE-A02.2c</b>	<b>Field Type</b>	Attachment
<b>Field Label/Question Text</b>	Attach disregarded asset approval letter.		
<b>Response</b>	Attach relevant disregarded asset approval letter from the CDFI Fund.		
<b>Response Instruction(s)</b>			
<div style="border: 1px solid black; padding: 5px;"> <p><b>NOTE:</b> The disregarded asset approval letter is not required to be submitted with the CDFI Certification Application.</p> </div>			

<b>Field</b>	<b>FE-A02.3</b>	<b>Field Type</b>	Currency
<b>Field Label/Question Text</b>	Indicate the dollar amount for the portion of the line item in the current fiscal year-to-date balance sheet to be disregarded.		
<b>Response</b>	Enter dollar amount.		
<b>Response Instruction(s)</b>			
Enter the dollar amount for the portion of the balance sheet line item for an asset held by the Applicant per the current fiscal year-to-date balance sheet showing the Applicant’s assets separately and distinctly from all other entities that has a use making it eligible to be disregarded. By “to be disregarded,” the CDFI Fund means to potentially be disregarded.			
<b>Field</b>	<b>FE-A02.4</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Explain how the amount of the asset to be disregarded was determined.		
<b>Response</b>	Enter explanation		
<b>Response Instruction(s)</b>			
The Applicant must describe how the amount of the asset dedicated to or derived from the use that makes it eligible to be disregarded was determined. “Eligible to be disregarded” means to potentially be disregarded.			
<i>If the Applicant has more than one balance sheet line item for which some or all of the relevant asset(s) has a use that makes it eligible to be disregarded for the purposes of the Financing Entity predominance test, repeat the data entry for each such item.</i>			

**5.6.4. Applicant Only – Financing Entity – Asset Predominance – Non-Consolidated Current Fiscal Year-To-Date Asset Data – FE-A03**

**Applicant Only - Asset Predominance – Non-Consolidated Current Fiscal Year-To-Date Asset Data – (FE- A03) Data Fields**

<b>FE-A03</b>	Based on assets held directly by the Applicant from a current fiscal year-to-date balance sheet that shows assets held by the Applicant separately and distinctly from all other entities, for each line item for which some or all of the asset is currently dedicated to or derived from the direct provision of eligible Financial Products and/or Financial Services:
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<div style="border: 1px solid black; padding: 5px; display: inline-block;"> <b>NOTE:</b> The use of “Financial Products or Financial Services” means eligible Financial Products and/or eligible Financial Services activity.                 </div>			
<b>Field</b>	<b>FE-A03.1</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Identify the line item.		
<b>Response</b>	Enter balance sheet line item name.		
<b>Response Instruction(s)</b>			
Enter the name of the balance sheet line item for an asset held by the Applicant, per the current fiscal year-to-date balance sheet, showing the Applicant’s assets separately and distinctly from all other entities, some or all of which is decided to or derived from eligible Financial Products or eligible Financial Services activity.			
<b>Field</b>	<b>FE-A03.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Indicate how the asset qualifies as being dedicated to or derived from the direct provision of eligible Financial Products or Financial Services.		
<b>Response</b>	Select one: <ul style="list-style-type: none"> <li>Cash dedicated to or derived from the direct provision of eligible Financial Products and/or Financial Services.</li> <li>Cash equivalents dedicated to or derived from the direct provision of eligible Financial Products and/or Financial Services.</li> <li>Portion of owned building from which revenue is generated that supports the direct provision of eligible Financial Products and/or Financial Services.</li> <li>Portion of owned equipment used for the direct provision of eligible Financial Products and/or Financial Services.</li> <li>Receivables derived from the direct provision of eligible Financial Products and/or Financial Services.</li> <li>Other</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response that indicates the use of some or all of the asset that qualifies that portion as being dedicated to or derived from the eligible Financial Products and/or eligible Financial Services activity.			
Fields FE-A03.2a through FE-A03.2b will <b>only appear if “Other”</b> is selected in the preceding field.			

<b>Field</b>	<b>FE-A03.2a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Identify the asset source or committed use that qualifies it as being dedicated to or derived from the direct provision of eligible Financial Products or Financial Services.		
<b>Response</b>	Enter activity.		
<b>Response Instruction(s)</b>			
If <b>“Other,”</b> indicate the particular asset activity or committed use for some or all of the asset that qualifies that portion as being dedicated to or derived from eligible Financial Products or eligible Financial Services activity.			
<b>Field</b>	<b>FE-A03.2b</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Has this asset been pre-approved by the CDFI Fund as being dedicated to or derived from the direct provision of Financial Products or Financial Services?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the “other” asset use has been pre-approved by the CDFI Fund via the <a href="#">“Obtaining Determination to Add Major Use(s) of Assets or Staff Time Eligible to be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests”</a> as one for which some or all of the assets used in that manner qualify as being dedicated to or derived from eligible Financial Product or eligible Financial Services activity for the purposes of the CDFI Certification Financing Entity predominance test.</p> <p>Select <b>“Yes” only if the “Other”</b> asset has a use for which the Applicant received an approval determination from the CDFI Fund via the <a href="#">“Obtaining Determination to Add Major Use(s) of Assets or Staff Time Eligible to Be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests”</a> process, allowing it to be accepted as an asset dedicated to or derived from the direct provision of eligible Financial Products or eligible Financial Services activity.</p> <p>If <b>“No,”</b> the asset does not qualify to be counted toward meeting the Financing Entity predominance test.</p>			
<b>Field</b>	<b>FE-A03.3</b>	<b>Field Type</b>	Currency
<b>Field Label/Question Text</b>	Indicate the dollar amount for the portion of the line item that is dedicated to or derived from the direct provision of eligible Financial Products and/or Financial Services.		
<b>Response</b>	Enter dollar amount.		

Response Instruction(s)			
Enter the dollar amount for the portion of the balance sheet line item for an asset held by the Applicant, per the current fiscal year-to-date balance sheet, showing the Applicant’s assets separately and distinctly from all other entities that is dedicated to or derived from eligible Financial Products and/or eligible Financial Services activity.			
Field	FE-A03.4	Field Type	Text
Field Label/Question Text	Explain how the amount was determined.		
Response	Enter explanation.		
Response Instruction(s)			
The Applicant must describe how the amount for the portion of the line item that is dedicated to or derived from eligible Financial Products and/or eligible Financial Services activity was determined.			
If the Applicant has more than one balance sheet line item for which some or all of the related assets are dedicated to or derived from eligible Financial Products and/or eligible Financial Services activity, repeat data entry for each such item.			

### 5.6.5. Applicant Only – Financing Entity – Asset Predominance – Non-Consolidated Current Fiscal Year-To-Date Asset Data – FE-A04

#### Applicant Only - Asset Predominance – Non-Consolidated Current Fiscal Year-To-Date Asset Data – (FE- A04) Data Fields

<b>FE-A4</b>	Based on assets held directly by the Applicant from a current fiscal year-to-date balance sheet that shows assets held by the Applicant separately and distinctly from all other entities, for each line item for which some or all of the asset is currently dedicated to an activity other than eligible Financial Products and/or eligible Financial Services activity and that has not been included as an asset, the Applicant seeks to have disregarded for the purposes of the Financing Entity predominance test:		
Field	FE-A04.1	Field Type	Text
Field Label/Question Text	Identify the line item.		
Response	Enter balance sheet line item name.		

Response Instruction(s)			
Enter the name of the balance sheet line item as it appears in the current fiscal year-to-date balance sheet, which shows the Applicant’s assets separately and distinctly from all other entities for an asset held by the Applicant, some or all of which is not dedicated to or derived from eligible Financial Products and/or eligible Financial Services activity.			
Field	FE-A04.2	Field Type	Picklist
Field Label/Question Text	Identify the relevant activity(ies) associated with the asset.		
Response	Select one: <ul style="list-style-type: none"> <li>• Real estate development.</li> <li>• Property management.</li> <li>• Ineligible financing activity:</li> <li>• Financing to affiliated individuals or entities.</li> <li>• Financing products services not approved by the CDFI Fund as eligible Financial Products or Financial Services.</li> <li>• Loan packaging/ origination/ servicing for financing provided by another entity(ies).</li> <li>• Grant making.</li> <li>• Development Services.</li> <li>• Training, counseling, and/or technical assistance that does not qualify as Development Services.</li> <li>• Other.</li> </ul>		
Response Instruction(s)			
Select the appropriate response to identify the relevant use/activity(ies) associated with the asset.			
Field	FE-A04.2a	Field Type	Text
Field Label/Question Text	If “Other,” describe.		
Response	Enter description.		
Response Instruction(s)			
If “Other,” was selected in FE-A04.2, fully describe the “other” relevant activity associated with the asset.			
Field	FE-A04.3	Field Type	Currency
Field Label/Question Text	Indicate the dollar amount for the portion of the line item that is dedicated to the selected activity.		
Response	Enter dollar amount		

Response Instruction(s)			
Enter the dollar amount for the portion of the line item that is dedicated to the selected activity.			
Field	FE-A04.4	Field Type	Text
Field Label/Question Text	Explain how the amount was determined		
Response	Enter explanation		
Response Instruction(s)			
The Applicant must explain how the amount for the portion of the line item that is dedicated to the selected activity was determined.			
If the Applicant has more than one balance sheet line item for which some or all of the related assets are dedicated to an activity other than eligible Financial Products and/or eligible Financial Services activity, repeat data entry for each such item.			

### 5.6.6. Applicant Only – Financing Entity – Asset Predominance – Non-Consolidated Current Fiscal Year-To-Date Asset Data – FE-A05

The following summary table pulls data from the previous subsection, Applicant Only – Financing Entity –Asset Predominance – Non-Consolidated Current Fiscal Year-to-Date Asset Data – FE-A04 and calculates totals.

#### Applicant Only - Asset Predominance – Non-Consolidated Current Fiscal Year-To-Date Asset Data – (FE- A05) Data Fields

<b>FE-A05</b>	<p>The following questions will provide a summary of total assets by activity based on data entered in previous questions in the Financing Entity – Asset Predominance – Non-Consolidated Current Fiscal Year-To-Date Data – Applicant section.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><b>NOTE:</b> The numbering system in the AMIS template Application will not match the guidance materials. However, all data fields are accurate. The Applicant will need to review the summary of total assets to determine if the share of all assets held by the Applicant (other than disregarded assets), that are dedicated to an activity other than eligible financing, is greater than the share of the Applicant’s overall assets dedicated to or derived from the direct provision of Financial Products and/or Financial Services. If so, the Applicant will need to explain why it should nevertheless be considered predominantly a Financing Entity. Otherwise, enter N/A.</p> </div>
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<b>Field</b>	<b>FE-A05.1</b>	<b>Field Type</b>	Auto calculated
<b>Field Label/Question Text</b>	Disregarded Assets		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-A02			
<b>Field</b>	<b>FE-A05.2</b>	<b>Field Type</b>	Currency
<b>Field Label/Question Text</b>	Assets dedicated to or derived from the direct provision of Financial Products and/or Financial Services		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-A03			
<b>Field</b>	<b>FE-A05.3</b>	<b>Field Type</b>	Currency
<b>Field Label/Question Text</b>	Real estate development		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-A04			
<b>Field</b>	<b>FE-A05.4</b>	<b>Field Type</b>	Currency
<b>Field Label/Question Text</b>	Property management		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-A04			
<b>Field</b>	<b>FE-A05.5</b>	<b>Field Type</b>	Currency
<b>Field Label/Question Text</b>	Ineligible financing to Affiliated individuals or entities		
<b>Response</b>	Auto calculated		

Response Instruction(s)			
Based on entries in FE-A04			
Field	FE-A05.6	Field Type	Currency
Field Label/Question Text	Loan packaging/origination/ servicing for financing provided by another entity(ies)		
Response	Auto calculated		
Response Instruction(s)			
Based on entries in FE-A04			
Field	FE-A05.7	Field Type	Currency
Field Label/Question Text	Grant making		
Response	Auto calculated		
Response Instruction(s)			
Based on entries in FE-A04			
Field	FE-A05.8	Field Type	Currency
Field Label/Question Text	Development Services		
Response	Auto calculated		
Response Instruction(s)			
Based on entries in FE-A04			
Field	FE-A05.9	Field Type	Currency
Field Label/Question Text	Training, counseling, and/or technical assistance that does not qualify as Development Services		
Response	Auto calculated		
Response Instruction(s)			
Based on entries in FE-A04			

<b>Field</b>	<b>FE-A05.10</b>	<b>Field Type</b>	Currency
<b>Field Label/Question Text</b>	Other		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-A04			
<b>Field</b>	<b>FE-A05.11</b>	<b>Field Type</b>	Currency
<b>Field Label/Question Text</b>	Total		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Should match entry in FE-A01			
<b>Field</b>	<b>FE-A05.11</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	If the share of all assets held by the Applicant (other than disregarded assets), that are dedicated to an activity other than eligible financing, is greater than the share of the Applicant’s overall assets dedicated to or derived from the direct provision of Financial Products and/or Financial Services, explain why the Applicant should nevertheless be considered predominantly a Financing Entity.		
<b>Response</b>	Provide explanation		
<b>Response Instruction(s)</b>			
If the asset data provides evidence that the Applicant is not predominantly a financing entity, enter N/A; as no additional explanation is required.			

### 5.6.7. Applicant Only – Financing Entity – Staffing Predominance

#### **Applicant Only – Staffing Predominance — (FE-AS) Data Fields**

Field	FE-AS01	Field Type	Numeric
Field Label/Question Text	Applicant’s average total full-time equivalent staff for the 12 months immediately prior to the submission of the CDFI Certification Application.		
Response	Enter Average Total FTE Staff.		
<b>Response Instruction(s)</b>			
<p>Enter the typical amount of FTE staff time available to the Applicant separately and distinctly from all other entities, as indicated by an assessment of the amount of FTE staff available to it during the most recent 12 full calendar months.</p> <p>The Applicant’s overall available staff should be identified in the form of Full Time Equivalent (FTE) staff time, not based on the number of staff members.</p> <p>Information on the amount of overall staff time available to an entity must be based on its own staffing levels and activities. It must not include staff time dedicated to the activities of another entity, even if that other entity is linked somehow, perhaps as an Affiliate or community partner (i.e., staff time spent on activity that will be claimed as having been carried out by or for any other entity, such as an Affiliate or a community partner must not be included in the staffing data used to assess compliance with the CDFI Certification Financing Entity requirements).</p> <p>Available staff time can include volunteer personnel or staffing provided by another entity. Staffing provided by another entity can include contracted staff or staff shared by/with another entity. For any staffing provided by or shared with another entity, only the portion of an individual’s time spent on activity specifically undertaken on behalf of and that will be solely attributed to the entity seeking to obtain or maintain CDFI Certification (i.e., the activity will not be claimed as having been carried out by or for any other entity) should be included in the staffing data.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Financing entity and staff time dedicated to or derived from eligible Financial Products or eligible Financial Services activity</li> <li>• Predominance as a financing entity</li> </ul>			
Field	FE-AS02	Field Type	Picklist
Field Label/Question Text	Does the Applicant request that the use of any of its FTE staff be disregarded for the purposes of the Financing Entity predominance test?		
Response	Yes or No		

Response Instruction(s)			
<p>Select the appropriate response to indicate whether the Applicant has any FTE staff time that is used in a way that makes it eligible to be disregarded for the purposes of the CDFI Certification Financing Entity predominance test.</p> <p><b>If “No,” skip to FE-AS03.</b></p> <p>The Applicant’s staff time should be identified in the form of Full Time Equivalent (FTE) staff time, not based on the number of staff members.</p>			
Field	FE-AS02.1	Field Type	Picklist
Field Label/Question Text	Indicate the use of FTE staff that qualifies it to be disregarded for the purposes of the Financing Entity predominance test.		
Response	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• Development Services</li> <li>• Endowment management</li> <li>• Management of portion of owned building used to support the direct provision of Financial Products or Financial Services</li> <li>• Management of donated Real Property to be sold to raise funds to support the direct provision of Financial Products or Financial Services</li> <li>• Management of real estate to be sold/transferred to non-Affiliated third parties to support real estate development financing activity</li> <li>• (Financial Products for real estate development must be offered)</li> <li>• Other</li> </ul>		
Response Instruction(s)			
<p>Select the appropriate response(s) that indicates the use of FTE staff that makes it eligible to be disregarded for the purposes of the CDFI Certification Financing Entity predominance test.</p> <p>Applicant’s staff time should be identified in the form of Full Time Equivalent (FTE) staff time, not based on the number of staff members.</p>			
Field	FE-AS02.1a	Field Type	Text
Field Label/Question Text	<b>If “Other,”</b> Identify the other FTE staff use.		
Response	Enter use		
Response Instruction(s)			
<p><b>If “Other”</b> is selected in FE-AS02, indicate the particular use of its FTE staff time that makes it eligible to be disregarded.</p> <p>Applicant’s staff time must be provided in terms of FTE staff time, not based on the number of staff members.</p>			

Field	FE-AS02.1b	Field Type	Text
Field Label/Question Text	<p>If <b>“Other,”</b> has this FTE staff use been pre-approved by the CDFI Fund as one for which some or all of the FTE staff used in that manner can be disregarded for the purposes of the CDFI Certification Financing Entity predominance test?</p>		
Response	Yes or No		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether the “other” use of staff time has been pre-approved by the CDFI Fund, via the <a href="#">“Obtaining Determination to Add Major Use(s) of Assets or Staff Time Eligible to be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests.”</a> as one for which some or all of the average weekly FTE staff used in that manner are eligible to be disregarded for the purposes of the CDFI Certification Financing Entity predominance test.</p> <p><b>Select “Yes” only if</b> the “Other” staff time use is one for which the Applicant received an approval determination from the CDFI Fund, via the “Obtaining Determination to Add Major Use(s) of Assets or Staff Time Eligible to be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests” process, allowing it to be accepted as a staff use eligible to be disregarded for the purposes of the CDFI Certification Financing Entity Predominance test.</p> <p><b>If “No,”</b> the FTE staff time will not be disregarded towards meeting the Financing Entity predominance test.</p> <p>The staffing information must be provided in terms of FTE staff time, not based on the number of staff members.</p>			
Field	FE-AS02.1c	Field Type	Attachment
Field Label/Question Text	<p>If <b>“Other,”</b> Attach approval letter.</p>		
Response	Attach relevant disregarded staff time approval letter from the CDFI Fund.		
Response Instruction(s)			
<p><b>NOTE:</b> The disregarded staff time approval letter is not required to be submitted with the CDFI Certification Application.</p>			
Field	FE-AS02.2	Field Type	Numeric
Field Label/Question Text	<p><u>If requesting that a use(s) of staff time be disregarded for the Financing Entity predominance test:</u> Indicate the amount of the Applicant’s average FTE staff to be disregarded.</p>		

<b>Response</b>	Enter FTE staff number.		
<b>Response Instruction(s)</b>			
Enter the amount of the Applicant’s FTE staff time spent on the particular use that makes it eligible to be disregarded. The staffing information must be provided in terms of FTE staff time, not based on the number of staff members.			
<b>Field</b>	<b>FE-AS02.3</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	<p>If requesting that a use(s) of staff time be disregarded for the <u>Financing Entity predominance test</u>:</p> <p>Explain how the amount of FTE staff to be disregarded was determined.</p>		
<b>Response</b>	Enter explanation.		
<b>Response Instruction(s)</b>			
The Applicant must fully explain how the amount of FTE staff time spent on the use that makes it eligible to be disregarded was determined. The staffing information must be provided in terms of FTE staff time, not based on the number of staff members.			
If the Applicant has more than one use of staff time that is eligible to be disregarded for the purposes of the CDFI Certification Financing Entity test, repeat the data entry for each relevant staff time use.			
<b>FE-AS3</b>	For FTE staff dedicated to the provision of Financial Products or Financial Services: <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <b>NOTE:</b> The use of “Financial Products or Financial Services,” means eligible Financial Products or eligible Financial Services activity.                 </div>		
<b>Field</b>	<b>FE-AS03.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Indicate the use of FTE staff that qualifies it as being dedicated to the provision of Financial Products or Financial Services.		
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• General entity administration that supports the provision of Financial Products or Financial Services</li> <li>• Direct staffing for the provision of Financial Products or Financial Services</li> <li>• Marketing and outreach for the provision of Financial Products or Financial Services</li> </ul>		

	<ul style="list-style-type: none"> <li>• Fundraising/raising capital for the provision of Financial Products or Financial Services.</li> <li>• Other</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response(s) that indicates the use(s) of the Applicant’s FTE staff that qualifies it as being dedicated to the provision of eligible Financial Products or eligible Financial Services activity. By Financial Products or Financial Services, the CDFI Fund means eligible Financial Products and/or eligible Financial Services activity.</p> <p>The staffing information must be provided in terms of FTE staff time, not based on the number of staff members</p>			
<b>Field</b>	<b>FE-AS03.1a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	<b>If “Other,”</b> Identify the other FTE staff use.		
<b>Response</b>	Enter use.		
<b>Response Instruction(s)</b>			
<p><b>If “Other”</b> is selected in FE-AS03.1, indicate the particular staff time use.</p> <p>The staffing information must be provided in terms of FTE staff time, not based on the number of staff members.</p>			
<b>Field</b>	<b>FE-AS03.1b</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<b>If “Other,”</b> has this FTE staff use been pre-approved by the CDFI Fund as one for which some or all of the staff time used in that manner qualifies as being dedicated to the provision of Financial Products or Financial Services for the purposes of the CDFI Certification Financing Entity predominance test?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the “other” use of FTE staff time has been pre-approved by the CDFI Fund, via the <a href="#">“Obtaining Determination to Add Major Use(s) of Assets or Staff Time Eligible to be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests.”</a> as one for which some or all of the average weekly FTE staff used in that manner qualify as being dedicated to eligible Financial Products or eligible Financial Services activity for the purposes of the CDFI Certification Financing Entity predominance test.</p> <p><b>Select “Yes” only if</b> the “Other” FTE staff time use is one for which the Applicant received an approval determination from the CDFI Fund, via the <a href="#">“Obtaining Determination to Add Major Use(s) of Assets or</a></p>			

<p><u>Staff Time Eligible to Be Disregarded or Included for the CDFI Certification Financing Entity Predominance Tests</u>” process, allowing it to be accepted as a staff time use dedicated to or derived from the direct provision of eligible Financial Products or eligible Financial Services activity.  <b>If “No,”</b> the FTE staff time cannot be counted towards meeting the Financing Entity predominance test.                  By Financial Products or Financial Services, the CDFI Fund means eligible Financial Products or eligible Financial Services activity.                  The staffing information must be provided in terms of FTE staff time, not based on the number of staff members.</p>			
<b>Field</b>	<b>FE-AS03.1c</b>	<b>Field Type</b>	Attachment
<b>Field Label/Question Text</b>	If “Other,” Attach approval letter.		
<b>Response</b>	Attach financing-related activity approval letter(s) from the CDFI Fund.		
<b>Response Instruction(s)</b>			
<p><b>NOTE:</b> The financing-related activity approval letter is not required to be submitted with the CDFI Certification Application.</p>			
<b>Field</b>	<b>FE-AS03.2</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the average amount of overall FTE staff dedicated to the provision of Financial Products and/or Financial Services.		
<b>Response</b>	Enter Average FTE staff number.		
<b>Response Instruction(s)</b>			
<p>Enter the average amount of the Applicant’s overall FTE staff time dedicated to eligible Financial Products and/or eligible Financial Services activity.                  By Financial Products or Financial Services, the CDFI Fund means eligible Financial Products and/or eligible Financial Services activity.                  The staffing information must be provided in terms of FTE staff time, not based on the number of staff members.</p>			
<b>Field</b>	<b>FE-AS03.3</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Explain how the amount was determined.		
<b>Response</b>	Enter explanation.		

Response Instruction(s)			
<p>The Applicant must fully explain how the amount of its FTE staff time dedicated to the provision of eligible Financial Products or eligible Financial Services activity was determined.</p> <p>By Financial Products or Financial Services, the CDFI Fund means eligible Financial Products or eligible Financial Services activity.</p> <p>The staffing information must be provided in terms of FTE staff time, not based on the number of staff members.</p>			
<p><b>FE-AS04</b> For FTE staff dedicated to activity that (1) is not the provision of Financial Products or Financial Services and (2) has not been included as a disregarded use for the purposes of the Financing Entity predominance test by the Applicant:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><b>NOTE:</b> The use of Financial Products or Financial Services means eligible Financial Products or eligible Financial Services activity.</p> <p>Staffing information must be provided in terms of FTE staff time, not based on the number of staff members.</p> </div>			
Field	<b>FE-AS04.1</b>	Field Type	Picklist
Field Label/Question Text	Identify the relevant activity(ies).		
Response	<p>Select one:</p> <ul style="list-style-type: none"> <li>• Real estate development</li> <li>• Property management</li> <li>• Ineligible financing activity:                             <ul style="list-style-type: none"> <li>○ Financing to affiliated individuals or entities</li> <li>○ Financing products/ services not approved by the CDFI Fund as eligible Financial Products or Financial Services</li> <li>○ Loan packaging/origination/servicing for financing provided by another entity(ies)</li> <li>○ Grant making.</li> <li>○ Training, counseling, and technical assistance that does not qualify as Development Services</li> <li>○ Other</li> </ul> </li> </ul>		
Response Instruction(s)			
<p>Select the appropriate response to identify the relevant use/activity the Applicant dedicates FTE staff time to other than eligible Financial Products or eligible Financial Services activity and that has not been included as a use the Applicant seeks to have disregarded for the purposes of the Financing Entity predominance test.</p> <p>The staffing information must be provided in terms of FTE staff time, not based on the number of staff members.</p>			

<b>Field</b>	<b>FE-AS04.1a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	If “Other,” describe.		
<b>Response</b>	Enter description.		
<b>Response Instruction(s)</b>			
<p>If “Other” is selected in FE-AS04, indicate the particular use of the Applicant’s FTE staff time that does not qualify as eligible Financial Products or eligible Financial Services activity and that has not been included as a use the Applicant seeks to have disregarded for the purposes of the Financing Entity predominance test.</p> <p>The staffing information must be provided in terms of FTE staff time, not based on the number of staff members.</p>			
<b>Field</b>	<b>FE-AS04.2</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Indicate the amount of the Applicant’s average FTE staff dedicated to the selected activity.		
<b>Response</b>	Enter FTE staff number		
<b>Response Instruction(s)</b>			
<p>Enter the amount of the Applicant’s FTE staff typically dedicated to the selected activity.</p> <p>The staffing information must be provided in terms of FTE staff time, not based on the number of staff members.</p>			
<b>Field</b>	<b>FE-AS04.3</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Explain how the amount was determined.		
<b>Response</b>	Enter explanation.		
<b>Response Instruction(s)</b>			
<p>The Applicant must fully explain how the amount of its FTE staff time dedicated to the selected activity was determined.</p> <p>The staffing information must be provided in terms of FTE staff time, not based on the number of staff members.</p>			
<p><i>If the Applicant has more than one type of activity for which related staff time is dedicated to an activity other than eligible Financial Products and/or eligible Financial Services activity, repeat the data entry for each relevant activity type.</i></p>			

### 5.6.8. Applicant Only – Financing Entity – Staffing Allocations – FE-AS05

#### Applicant Only – Staffing Allocations — (FE-AS05) Data Fields

<b>FE-AS05</b>	<p>The following questions will provide a summary of total staff time by activity based on data entered in previous questions in the Applicant –Financing Entity – Staffing Predominance</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><b>NOTE:</b> The staffing information provided by the Applicant must be provided in terms of FTE staff time, not based on the number of staff members. The numbering system in the AMIS template Application will not match the guidance materials, however; all data fields are accurate. The Applicant will need to review the summary of total staff time by activity to determine if any of the Applicant’s average FTE staff hours (other than disregarded staff time) that has been dedicated to an activity other than eligible financing activity is greater than the share of the Applicant’s average FTE staff dedicated to the provision of Financial Products and/or Financial Services. Explain why the Applicant should still be considered predominantly a Financing Entity. Otherwise, enter N/A.</p> </div>		
<b>Field</b>	<b>FE-AS05.1</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Disregarded Development Services FTE staff		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-AS02			
<b>Field</b>	<b>FE-AS05.2</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Other disregarded FTE staff		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-AS02			
<b>Field</b>	<b>FE-AS05.3</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	FTE staff dedicated to or derived from the direct provision of Financial Products and/or Financial Services.		

<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-AS03			
<b>Field</b>	<b>FE-AS05.4</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Real estate development		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-AS04			
<b>Field</b>	<b>FE-AS05.5</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Property management		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-AS04			
<b>Field</b>	<b>FE-AS05.6</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Ineligible financing to Affiliated individuals or entities.		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-AS04			
<b>Field</b>	<b>FE-AS05.7</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Loan packaging/origination/ servicing for financing provided by another entities.		
<b>Response</b>	Auto calculated		

Response Instruction(s)			
Based on entries in FE-AS04			
Field	FE-AS05.8	Field Type	Numeric
Field Label/Question Text	Grant making		
Response	Auto calculated		
Response Instruction(s)			
Based on entries in FE-AS04			
Field	FE-AS05.9	Field Type	Numeric
Field Label/Question Text	Training, counseling, and technical assistance that does not qualify as Development Services.		
Response	Auto calculated		
Response Instruction(s)			
Based on entries in FE-AS04			
Field	FE-AS05.10	Field Type	Numeric
Field Label/Question Text	Other		
Response	Auto calculated		
Response Instruction(s)			
Based on entries in FE-AS04			
Field	FE-AS05.11	Field Type	Numeric
Field Label/Question Text	Average Total FTE Staff		
Response	Auto calculated		
Response Instruction(s)			
Should match entry in FE-AS01			

*If the share of any of the Applicant’s average FTE staff (other than disregarded staff time) that has been dedicated to an activity other than eligible financing activity is greater than the share of the Applicant’s average FTE staff dedicated to the provision of Financial Products and/or Financial Services, explain why the Applicant should still be considered predominantly a Financing Entity. Provide explanation.*

### 5.6.9. Applicant Only – Financing Entity – Capital to Finance Typical Eligible Financial Products Transaction Within Next Three Months

**Applicant Only – Capital to Finance Financial Products Closing During Next Three Months—(FE-AC) Data Fields**

<b>Field</b>	<b>FE-AC01</b>	<b>Field Type</b>	<b>Currency</b>
<b>Field Label/Question Text</b>	Average dollar amount of a Financial Product transaction financed by the Applicant over the 12 months immediately prior to the submission of the Application.		
<b>Response</b>	Enter dollar amount		
<b>Response Instruction(s)</b>			
Provide the average dollar amount of the eligible Financial Products activity financed by the Applicant over the 12 months immediately prior to the submission of the CDFI Certification Application.			
<b>FE-AC2</b> Based on assets in the current fiscal year-to-date balance sheet, for each line item for which some or all of the assets will be available during the next three months to finance the Applicant’s Financial Products closings.			
<b>Field</b>	<b>FE-AC02.1</b>	<b>Field Type</b>	<b>Text</b>
<b>Field Label/Question Text</b>	Identify the line item.		
<b>Response</b>	Enter balance sheet line item name(s).		
<b>Response Instruction(s)</b>			
The balance sheet account names used in the asset table should be line item names (either overall asset type or specific sub-type line item names).			
<b>Field</b>	<b>FE-AC02.2</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Indicate why the asset is considered to be liquid and available to finance the Applicant’s Financial Product closings over the next three months.		

<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>Cash/cash equivalent asset designated as Financial Product capital</li> <li>Current asset that is or will become a cash/cash equivalent asset within the next three months and that will be designated as Financial Product capital</li> <li>Portion of owned building from which revenue is generated that is designated as Financial Product capital</li> <li>Other</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate why the asset is considered to be liquid and available to finance an eligible Financial Products transaction(s) closing by the Applicant within the three full calendar months immediately following the submission of the CDFI Certification Application. While the label/question for this field indicates that more than one response can be chosen, only one should be selected.			
<i>FE-AC02.2a will only appear if "Other" is selected in the preceding field.</i>			
<b>Field</b>	<b>FE-AC02.2a</b>	<b>Field Type</b>	<b>Narrative</b>
<b>Field Label/Question Text</b>	If "Other," explain		
<b>Response</b>	Provide explanation.		
<b>Response Instruction(s)</b>			
If "Other" is selected in FE-AC02.2, indicate why the asset should be considered liquid, as well as available to finance an eligible Financial Products transaction closing(s) by the Applicant within the three full calendar months immediately following the submission of the CDFI Certification Application.			
<b>Field</b>	<b>FE-AC02.3</b>	<b>Field Type</b>	<b>Currency</b>
<b>Field Label/Question Text</b>	Indicate the dollar amount for the portion of the line item that will be available to finance the Applicant's Financial Product closings.		
<b>Response</b>	Enter dollar amount.		
<b>Response Instruction(s)</b>			
Provide the dollar amount for the portion of the line item that will be available to finance an eligible Financial Products transaction closing(s) by the Applicant within the three full calendar months immediately following the submission of the CDFI Certification Application.			

<b>Field</b>	<b>FE-AC02.4</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Explain how the amount was determined.		
<b>Response</b>	Provide explanation.		
<b>Response Instruction(s)</b>			
The Applicant must describe how it determined the amount of the relevant balance sheet line item that will be available to finance an eligible Financial Products transaction closing(s) by it within the three full calendar months immediately following the submission of the CDFI Certification Application.			
<i>If the Applicant has more than one balance sheet line item for which some or all of the related assets will be available to finance its Financial Products closings over the next three months, repeat the data entry for each such item.</i>			
<b>Field</b>	<b>FE-AC03</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant have any off-balance sheet capital that will be available to it during the next three months to finance its eligible Financial Product closings?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response. <b>Select “Yes”</b> only if the relevant capital will be available within the three full calendar months immediately following submission of the CDFI Certification Application and can be used by the Applicant to finance an eligible Financial Products transaction(s). Capital that is currently available or will become available during the three full calendar months following submission of the CDFI Certification Application, but that is or will be committed to or restricted to uses other than that of financing an eligible Financial Products transaction closing(s) by the Applicant cannot be used to meet the CDFI Certification requirement that sufficient capital be available for an entity to continue its eligible Financial Products activity. Any capital not currently available that is expected received after submission of the CDFI Certification Application (e.g., from loan repayments, a grant, etc.), but not within the three full calendar months immediately following its submission cannot be used to meet this requirement.			
<b>Field</b>	<b>FE-AC03.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Indicate the type of off-balance sheet capital available.		
<b>Response</b>	Select type. <ul style="list-style-type: none"> <li>• Line of credit.</li> <li>• Grant or loan funds formally committed.</li> <li>• Capital held by an Affiliate formally committed.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Other.</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate the type of off-balance sheet capital available.			
<i>FE-AC3.1 – FE-AC3.4 will only appear if “Other” is selected in the preceding field.</i>			
<b>Field</b>	<b>FE-AC03.1a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	If “Other,” explain.		
<b>Response</b>	Provide explanation.		
<b>Response Instruction(s)</b>			
If “Other” is selected in FE-AC03.1, enter the “other” type of off-balance sheet capital available to the Applicant that is not currently listed.			
<b>Field</b>	<b>FE-AC03.2</b>	<b>Field Type</b>	Currency
<b>Field Label/Question Text</b>	Provide the dollar amount available		
<b>Response</b>	Enter dollar amount		
<b>Response Instruction(s)</b>			
Enter the dollar amount that represents the overall amount of funds from this particular source of capital expected to be available during the three full calendar months following submission of the CDFI Certification Application.			
<b>Field</b>	<b>FE-AC03.3</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Explain why the off-balance sheet capital is considered to be formally committed		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
The Applicant must describe why the off-balance sheet capital in the specific amount identified is considered to be formally committed and expected to be available during the three full calendar months following submission of the CDFI Certification Application.			
<b>Field</b>	<b>FE-AC03.4</b>	<b>Field Type</b>	Attachment
<b>Field Label/Question Text</b>	Provide documentation evidencing that the off-balance sheet capital is formally available and that it includes the amount available.		

<b>Response</b>	Attach document(s).		
<b>Response Instruction(s)</b>			
Attach document(s) evidencing that the off-balance sheet capital is formally available and includes the amount available.			
<p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> <p><b>Examples of acceptable documentation include:</b> for a line of credit attach proof of approval commitment from the lender and recent available balance; for grant or loan funds committed, but not yet received, attach a formal approval commitment letter from the funder or lender; for capital held by an Affiliate, attach proof of the approval commitment signed by an Authorized Representative for the Affiliate.</p>			
<i>If the Applicant has multiple off-balance sheet capital sources available, repeat data entry for each source.</i>			
<b>Field</b>	<b>FE-AC04</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Total capital available to finance eligible Financial Product closings over the next three months		
<b>Response</b>	Auto calculated		
<b>Response Instruction(s)</b>			
Based on entries in FE-AC02 and FE-AC03			
<b>Field</b>	<b>FE-AC05</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Is the available capital greater than the average dollar amount of a Financial Product transaction financed by the Applicant over the 12 months immediately prior to the submission of the Application?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response as to whether the available capital is greater than the average dollar amount of a Financial Products transaction financed by the Applicant over the 12 months immediately prior to the submission of the Application.			

## 5.7. Target Market

### **CDFI Certification Target Market Requirements**

To meet the CDFI Certification Target Market requirements, an entity must direct at least 60% of both the number and dollar volume of all (not just a select subset) the eligible Financial Products transactions it closes during a full 12-month fiscal year to an eligible CDFI Certification Target Market. Or, if it is a depository institution and it cannot meet the CDFI Certification Target Market benchmark requirements based on eligible Financial Products activity alone, it can elect to use the CDFI Certification Target Market Financial Products and Financial Services option.



The CDFI Certification Target Market benchmark percentages must be met without any rounding of decimal points.

An entity may meet the Target Market benchmark requirements using an eligible CDFI Certification Target Market that consists of multiple eligible Target Market components. (For example, an entity may demonstrate compliance with the Target Market percentage benchmarks by serving a pre-qualified Investment Area, one or more customized Investment Areas, or one or more Targeted Populations.) However, for the purposes of calculating an entity's Target Market activity levels, each eligible Financial Products transaction or eligible Financial Service must be counted as Target Market-directed in connection with just one market component, even if the transaction or account qualifies as having been directed to more than one eligible market.

New CDFI Certification Applicants must, except as allowed in connection with certain CDFI Certification provisions, meet the CDFI Certification Target Market percentage benchmarks based on all eligible Financial Products activity closed during the full 12 month fiscal year completed just prior to submission of their CDFI Certification Application (cannot be based on just a select subset of those transactions) and, if applicable, based on the status of all applicable eligible Financial Services as of the last day of the most recently completed full 12 month fiscal year. If a CDFI Certification Applicant's eligible Financial Products and, if elected and allowed, eligible Financial Services activity is below the required level for any of the applicable Target Market percentage benchmarks, the entity is not eligible for CDFI Certification.

For CDFI Certification Application purposes, an entity that has not closed at least one eligible Financial Products transaction during its most recently completed fiscal year and that is not eligible for either the CDFI Certification provision for DIHC(s) that do not engage in their own direct eligible Financial Products activity or the CDFI Certification Spin-off provision, is not eligible to apply.

Certified CDFIs will be assessed for compliance with the CDFI Certification Target Market percentage benchmarks each fiscal year. To confirm that a Certified CDFI continues to direct eligible Financial Products or eligible Financial Services activity to its approved CDFI Certification Target Market at the required levels, transaction level data will be reviewed annually, through the submission of a Transaction Level Report(s) (TLR[s]), in connection with the Annual Certification and Data Collection Report (ACR). A Certified CDFI that fails to meet the Target Market benchmarks for the most recently completed fiscal year may demonstrate compliance with the Target Market benchmark requirements by showing that the benchmarks were met over a three-year period through the last day of the most recently completed fiscal year – as measured by the data submitted in the CDFI's three most recent

TLR(s), including the initial Certification Application related TLR, if necessary. A Certified CDFI that fails to meet the Target Market benchmarks for the most recently completed fiscal year timeframe in connection with its first ACR submission will have the option to be evaluated over a two-year period through the last day of the most recently completed fiscal year. Certified CDFI(s) that still fall below the Target Market benchmarks for the three fiscal year timeframe (or, for those submitting their first ACR, the two fiscal year timeframe) will be decertified and no cure period will be granted.

<b>NOTE</b>	Only data submitted via an abbreviated TLR or the December 2023 or later version of the CDFI/NACA/RRP/ERP TLR may be taken into consideration for a multi-year Target Market benchmark assessment (i.e., data submitted outside of a TLR or via, a pre-2023 version of the CDFI/NACA/RRP/ERP TLR, may not be used for that option).
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### **Target Market Requirement- Financial Services Option**

A depository institution (including a DIHC) that directs **less than 60% but at least 50%** of *either* the number or the dollar volume of its eligible Financial Products activity to an eligible CDFI Certification Target Market has the option of meeting the CDFI Certification Target Market benchmark requirements by demonstrating that it served an eligible CDFI Certification Target Market as follows:

- As of the last day of its fiscal year, **at least 60%** of its total unique depository account holders were part of its CDFI Certification Target Market; ***and***
- The eligible Financial Products transactions it closes during a full 12-month fiscal year are directed to its eligible CDFI Certification Target Market at the following levels (must be based on all eligible Financial Products transactions closed, not just a select subset of such transactions):
  - **60%** of the number and **50%** of the dollar volume; **or**
  - **50%** of the number and **60%** of the dollar volume.

The CDFI Certification Target Market benchmark percentages must be met without any rounding of decimal points.



The CDFI Certification Target Market benchmark percentages must be met without any rounding of decimal points.

### **Target Market Assessment Methodology(ies)**

To identify eligible Financial Products or, if applicable, eligible Financial Services activity that has been directed to a particular Target Market, collective review Target Market or Native American CDFI Native Communities market component, an appropriate CDFI Certification Target Market Assessment Methodology(ies), approved by the CDFI Fund in connection with the applicable market component type, must be used (e.g., if the market component is an Investment Area, then a CDFI Certification Target Market Assessment Methodology(ies) approved for the Investment Area market type must be used). CDFI Certification Target Market Assessments must be conducted using only the CDFI Fund-approved Target Market Assessment Methodologies identified in the [Pre-approved CDFI Certification Market Assessment Methodologies Guidance](#) document and must be implemented exactly as outlined in that document, unless and until the CDFI Fund authorizes a new or amended method(s). Appropriate records must be available for each eligible Financial Products and, if applicable, eligible Financial

Services transaction classified as having been directed to an entity’s CDFI Certification Target Market or, as applicable, collective review Target Market to demonstrate the validity of that classification.

Failure to use an approved CDFI Certification Target Market Assessment Methodology exactly as prescribed by the CDFI Fund (or maintain related required documentation) may result in the termination of an entity’s CDFI Certification.

An allowable CDFI Certification Target Market Assessment Methodology(ies) that was used when compiling the Target Market data for CDFI Certification Application-purposes or that will be used moving forward must be identified for each Target Market component proposed as part of the Applicant’s overall CDFI Certification Target Market and, as applicable, each collective review Target market.

If a CDFI Certification Target Market Assessment Methodology identified for a proposed Target Market or collective review Target Market component is not approved to be used in connection with the relevant Target Market component’s market type (even if a methodology[ies] that is approved for the relevant Target Market type was also identified), the proposed Target Market/collective review Target Market component will be disallowed. The decision to disallow this Target Market component is because the Applicant may have designated Target Market activity based on an unacceptable CDFI Certification Target Market Assessment Methodology(ies) for that Target Market

	<p><b><i>Collective Review</i></b></p>
<p>The Applicant must identify an allowable CDFI Certification Target Market Assessment Methodology(ies) that was used when compiling the Target Market data presented for CDFI Certification Application-purposes or that will be used moving forward for each Target Market component proposed as each collective review Target Market. If a CDFI Certification Target Market Assessment Methodology identified for a proposed Target Market or collective review Target Market component is not approved to be used in connection with the relevant market component’s market type (even if a methodology[ies] that is approved for the relevant market type was also identified), the proposed Target Market or collective review Target Market component will be disallowed. The justification is that the Applicant may have counted activity as having been directed to that Target Market using an unacceptable CDFI Certification Target Market Assessment Methodology(ies) for that Target Market.</p>	

An entity will not be limited to using only the approved CDFI Certification Target Market Assessment Methodology(ies) it identifies in its CDFI Certification Application submission. Any CDFI Fund-approved CDFI Certification Target Market Assessment Methodology can be used by a Certified CDFI in connection with the applicable Target Market type at will on an ongoing basis. In other words, a Certified CDFI does not have to seek a determination from the CDFI Fund when it wants to add any CDFI-Fund pre-approved CDFI Certification Target Market Assessment Methodology to its business practices. The section below discusses the process for when an Applicant seeks a determination about a completely new or amended CDFI Certification Target Market Assessment Methodology.


***Obtaining Determination for New or Amended CDFI Certification Target Market Assessment Methodology(ies)***

Only the CDFI Certification Target Market Assessment Methodologies approved by the CDFI Fund may be used when compiling data on CDFI Certification-related Target Market activity levels. Entities must obtain prior approval from the CDFI Fund before starting to use a CDFI Certification Target Market


Assessment Methodology(ies) not previously approved by the CDFI Fund or an amended version of an existing methodology(ies). For CDFI Certification Applicants, approval of any such change must be received before the CDFI Certification Application is submitted.

For information on how to request approval to use a new or amended CDFI Certification Target Market Assessment Methodology, please see [“Obtaining Determination for New or Amended CDFI Certification Target Market Assessment Methodology\(ies\)”](#) section of this guidance.

**Target Market Collective Review for DIHC(s), Affiliates of DIHC(s), and Subsidiaries of IDI(s):**

	<b><i>Collective Review</i></b>
<p>For a DIHC, an Affiliate of a DIHC, or a Subsidiary of an IDI to be certified as a CDFI, it must meet the Target Market requirements both:</p> <ul style="list-style-type: none"> <li>• <b>Individually</b>, based on its own eligible Financial Products and, if elected and allowed, its applicable eligible Financial Services activity (except as allowed for entities eligible for the CDFI Certification provision for DIHC[s] that do not engage in their own direct eligible Financial Products activity); <b><i>and</i></b></li> <li>• <b>Collectively</b>, based on the aggregate eligible Financial Products and, if elected and allowed, the aggregate eligible Financial Services activity of it and each Affiliate or other entity in its family of entities that is relevant to its collective review process.</li> </ul> <p>For more information on compiling data for the collective review of Target Market, see the <a href="#">“Collective Review Requirements - Depository Institution Holding Companies (DIHC[s]), Affiliates of DIHC(s), and Subsidiaries of Insured Depository Institutions (IDI[s])”</a> section of this guidance manual.</p>	

**Target Market and Depository Institution Holding Companies (DIHC[s]) That Do Not Directly Engage in Eligible Financial Products Activity**

	<b><i>Collective Review</i></b>
<p>DIHC(s) that do not directly engage in eligible Financial Products activity may rely on the activity of all Affiliates relevant to their CDFI Certification collective review process.</p>	

**Target Market and Entities Using CDFI Certification Solely for Participation in the CDFI Fund’s BG Program**

Entities applying for Certification solely for participation as Eligible CDFI(s) in the CDFI Fund’s BG Program may meet CDFI Certification Target Market requirements using Financial Products activity that is not arm’s-length, provided that the activity is by and between such entities and their Controlling Certified CDFI(s). Such activity must be pursuant to operating agreements that include management and ownership provisions and that are in a form and substance acceptable to the CDFI Fund (see 12 CFR 1805.201(b)(2)(C)(iii)).

## **Target Market and CDFI Certification Provision for Spin-off Entities**

If an entity seeking to obtain or maintain CDFI Certification is eligible for the CDFI Certification provision for Spin-off(s), it must include the following Financial Products and Financial Services activity data for review in connection with the Target Market requirements:

- Each eligible Financial Products transaction it closed during any part of what would have been its most recently completed fiscal year timeframe as of when the CDFI Certification Application is submitted (if it were in existence and closed any eligible Financial Products transactions during that time);
- Each eligible Financial Products transaction received as part of a spun-off Financial Products portfolio transferred to it at no cost by each entity it is claiming as an eligible Spin-off-related Affiliate that were closed by the transferring entity during what would have been the Spin-off's most recently completed fiscal year when the CDFI Certification Application is submitted and that were still on the Spin-off's balance sheet as of the CDFI Certification Application submission date; and
- If elected and allowed for a depository institution, all depository accounts held by the Spin-off entity that were still open as of the end of what would have been its most recently completed fiscal year as of when the CDFI Certification Application is submitted (if it were in existence at that time).

Remember an eligible Spin-off related Affiliate must meet the following conditions: an entity that is an Affiliate as of the date the CDFI Certification Application using the Spin-off provision is submitted; it was an Affiliate when the Financial Products portfolio transfer took place; and it was not a Certified CDFI at any point during the 12 months of what would have been, if it was in existence at that time, the Spin-off's most recently completed fiscal year timeframe, whose transferred portfolio included Financial Products transactions it closed at arm's-length and as a financing entity of record in the associated transaction closing documents.

### ***Obtaining Determination for New Targeted Population(s)***

Targeted Populations that are not already recognized by the CDFI Fund must be approved by the CDFI Fund before they can be included as part of an entity's CDFI Certification Target Market.

For CDFI Certification Applicants, approval of any new CDFI Certification Targeted Population must be received before the CDFI Certification Application is submitted.

For information on how to request recognition by the CDFI Fund of a new CDFI Certification Targeted Population, please see "[Obtaining Determination for New Targeted Population\(s\)](#)" in the Propose Additional Targeted Population(s) section of this guidance.

## **Eligible CDFI Certification Target Market Types**

A CDFI Certification Target Market can be composed of one or more of the following Target Market components listed in this section under "Investment Area" and "Targeted Population."

### **Investment Area**

An Investment Area meets at least one of the following economic distress criteria and has significant unmet needs for Financial Products and Services; or it is wholly located within an Empowerment Zone or

Enterprise Community (as designated under section 1391 of the Internal Revenue Code of 1986 [26 U.S.C.1391]).

Economic Distress Criteria:

- Poverty rate greater than 20%;
- Median family income (MFI) at 80% or below specific MFI benchmarks; or
- Unemployment rate 1.5 times the national average.

Entities must base their assessment of what constitutes an Investment Area using census tracts identified by the CDFI Fund as qualified for CDFI Certification purposes. Census tracts qualified as eligible for other programs or certifications (e.g., the New Markets Tax Credit [NMTC] Program and Community Development Entity [CDE] Certification) or that an entity may self-identify based on the CDFI-related distress criteria cannot be used for CDFI Certification purposes.

There are three types of Investment Areas (IA[s]):

**Pre-qualified Investment Area – Qualified Census Tracts Only**

- A pre-qualified Investment Area consists only of individual census tracts that the CDFI Fund has determined meet one or more of the statutory economic distress criteria. If an entity elects to serve an Investment Area comprised of qualified census tracts only, the eligible Financial Products or eligible Financial Services activity that falls within a qualified census tract(s) anywhere within the United States, its territories, or the District of Columbia, as demonstrated by using the CDFI Fund’s approved CDFI Certification market assessment methodologies, is counted as being within the entity’s Target Market or, as applicable, collective review Target Market.
  - Pre-qualified Investment Areas consist of qualified census tracts only. Counties/parishes that may qualify as meeting the CDFI economic distress criteria, wholly, are not considered to be part of a pre-qualified Investment Area.

**Customized Investment Areas**

- Entities may also establish a customized Investment Area consisting of specially designated geographic area that:
  - Includes a contiguous mix of both qualified and non-qualified geographic units of a single type, which must be census tracts for Metropolitan customized Investment Areas or census tracts or<sup>30</sup> counties or county equivalents (e.g., parishes; municipalities in Puerto Rico, etc.)<sup>31</sup> for non-Metro customized Investment Areas that have not been included in any other customized Investment Area in an entity’s overall CDFI Certification Target Market or,

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<sup>30</sup> “Non-Metro” or “Non-Metropolitan” refers to any area that does not qualify as a Metropolitan Statistical Area, which is defined by the Office of Management and Budget (OMB) as “at least one urbanized area of 50,000 or more population, plus adjacent territory that has a high degree of social and economic integration with the core as measured by commuting ties.” <https://www.whitehouse.gov/wp-content/uploads/2020/03/Bulletin-20-01.pdf>

<sup>31</sup> Per 12 CFR 1805.201(b)(3)(2)(B), “geographic units in Metropolitan Areas that are used to comprise an Investment Area shall be limited to census tracts, and Indian Reservations.”

for an entity being assessed in connection with another entity’s CDFI Certification collective review process, in its collective review Target Market; ***and***

- Validates as a distressed area per the CDFI Fund’s mapping system (CIMS) by meeting the following criteria:
  - More than 85% of the population must be in qualified geographic units.
  - The geographic units must be contiguous.
- If an entity designates an allowable customized Investment Area as a Target Market component, the eligible Financial Products or eligible Financial Services activity that falls within the boundaries of the customized Investment Area geography is counted as being directed to that particular customized Investment Area.
- Although financing activity can occur and be counted in individually non-qualifying census tracts within a customized Investment Area, an entity must direct at least 85% of its customized Investment Area financing activity within the individually qualified census tracts of that customized Investment Area for activity in the non-qualifying tracts of the customized Investment Area to count toward the 60% Target Market benchmark. The CDFI Fund’s approved CDFI Certification market assessment methodologies must be used to demonstrate that a customized Investment Area is being served.

<b>NOTE</b>	If an entity has more than one customized Investment in its CDFI Certification Target Market or, if applicable, its CDFI Certification collective review market, any overlap between the geographies is prohibited (i.e., any census tract in one customized Investment Area cannot be part of any other customized Investment Area included in the entity’s relevant overall market).
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Non-Metro Customized Investment Areas, Counties, and Parishes

- Prior to October 1, 2027, an entity that serves a non-Metro customized Investment Area, 32 county, or parish also must direct at least 75% of its non-Metro customized Investment Area, county, or parish eligible Financial Products or eligible Financial Services activity within the individually qualified census tracts of the respective non-Metro geography for activity in the non-qualifying tracts of the non-Metro geography to count toward the 60% Target Market benchmark. The CDFI Fund’s approved CDFI Certification market assessment methodologies must be used to demonstrate that a non-Metro customized Investment Area(s), counties, or parishes is being served.
- Beginning October 1, 2027, an Applicant that serves a non-Metro customized Investment Area, county, or parish must direct at least 85% of its non-Metro customized Investment Area, county, or parish eligible Financial Products or eligible Financial Services activity within the individually qualified census tracts of the respective non-Metro geography for activity in the non-qualifying tracts of the non-Metro geography to count toward the 60% Target Market benchmark. The Applicant must use the CDFI Fund’s approved CDFI Certification market assessment methodologies to demonstrate that it is servicing the non-Metro customized Investment Area(s), counties, or parishes.

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<sup>32</sup> A non-Metro customized Investment Area must consist exclusively of non-Metro geographic units.

<b>NOTE</b>	<p>The CDFI Fund recommends that the Target Market type of “Investment Area – Pre-qualified” always be included for situations in which a customized Investment Area(s) is proposed for an entity’s CDFI Certification Target Market record. The recommendation also stands if the entity is one that is relevant to another entity CDFI Certification collective review process. The situation could arise whereby eligible Financial Products or, if applicable the Financial Products and Financial Services option, directed to the non-qualified census tract(s) within a particular customized Investment Area geography are deemed ineligible to be counted towards meeting the Target Market benchmark requirements. The inclusion of the “Investment Area – Pre-qualified” Target Market type will potentially allow activity of the type(s) that cannot be counted as Investment Area-directed if it falls within a non-qualified census tract(s) to count as Investment Area-directed if it was directed to a qualified census tract(s) within the relevant customized Investment Area. This rationale assumes the pre-qualified Investment Area market component can be approved by the CDFI Fund as part of the overall CDFI Certification Target Market/collective review Target Market.</p>
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### Targeted Population

“Targeted Population” is defined as individuals, or an identifiable group of individuals, who are Low-Income or lack adequate access to Financial Products or Financial Services. The Targeted Population is specific to the individual borrowers whose socioeconomic characteristics are used to determine inclusion in the Target Market. The Applicant must use the CDFI Fund’s approved CDFI Certification market assessment methodologies to demonstrate that it serves the Targeted Population.

Targeted Populations include Low-Income Targeted Populations (LITP) and Other Targeted Populations (OTP):

#### Low-Income Targeted Populations

Individuals qualify as members of the Low-Income Targeted Population if their family income is as follows:

- For Metropolitan Areas,
  - 80% of the area median family income (adjusted for family size); **or**
- For non-Metropolitan Areas, the greater of
  - 80% of the area median family income (adjusted for family size); **or**
  - 80% of the statewide non-Metropolitan Area median family income (adjusted for family size).

#### Other Targeted Populations

Other Targeted Populations currently recognized by the CDFI Fund are as follows:

- Other Targeted Population – African American.
- Other Targeted Population – Hispanic.
- Other Targeted Population – Native American.
- Other Targeted Population – Native Alaskan.


- Other Targeted Population – Native Hawaiian.
- Other Targeted Population – Other Pacific Islander.
- Other Targeted Population – Filipino.
- Other Targeted Population – Vietnamese.
- Other Targeted Population – Persons with Disabilities.
- Other Targeted Population – Certified CDFI(s).

**CDFI Certification Market Records**

If seeking to obtain CDFI Certification to amend an approved CDFI Certification Target Market or collective review Target Market, or to update its Accountability information, an entity must:

- Create a new CDFI Certification Market record(s) in the CDFI Certification Market section of its AMIS account to represent each component in its CDFI Certification Target Market.
- If applicable, create a new CDFI Certification Market record(s) in the CDFI Certification Market section of the AMIS account for each Affiliate or other entity relevant to its CDFI Certification collective review process to represent each component in the CDFI Certification collective review Target Market that the other entity(ies) will use in connection with the primary entity under review’s CDFI Certification review process.

<b>NOTE</b>	<p>Targeted Population types are each considered separate Target Market components.</p> <p>Pre-existing CDFI Certification Market records in an entity’s AMIS account (including those that are in an approved, rejected, or previously approved/historical status) cannot be used to represent components in a proposed Target Market or collective review Target Market.</p> <p>If an entity seeks to obtain the Native American CDFI designation, it must also create a Native Communities CDFI Certification Market record in the CDFI Certification Market records section of its AMIS account.</p>
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**[CLARIFYING UPDATE 07/05/2025]**

**CDFI Certification Market record naming convention:**

The naming convention has two elements that should be separated by an underscore:

- Target Market type
- Number

Format: **Target Market type\_#**

Target Market Type

Use the following abbreviations when indicating the Target Market type:

- Investment Area – Prequalified → IAPreq

- Investment Area – Customized → CIA
- Investment Area – Non-Metro Customized → NM-CIA
- Investment Area – Non-Metro Counties/Parishes → NMCP-CIA
- Low-Income Targeted Population → LITP
- Other Targeted Population – African American → OTP-AA
- Other Targeted Population – Hispanic → OTP-H
- Other Targeted Population – Native American → OTP-NA
- Other Targeted Population – Native Alaskan → OTP-NAK
- Other Targeted Population – Native Hawaiian → OTP-NHI
- Other Targeted Population – Other Pacific Islander → OTP-OPI
- Other Targeted Population – Filipino → OTP-F
- Other Targeted Population – Vietnamese → OTP-V
- Other Targeted Population – Persons with Disabilities → OTP-PWD
- Other Targeted Population – Certified CDFIs → OTP-CDFI

#### Number

The number represents the sequence in which a market component is submitted:

- “1” for the initial submission
- “2” for a resubmission due to a market amendment
- “3” for a subsequent submission, and so on

*Examples: LITP\_1, CIA\_2*

#### Special Cases

##### 1. Multiple Customized Investment Areas

If an Applicant proposed more than one Customized Investment Area or Non-Metro Customized Investment Area, each distinct geography must have a separate AMIS record. Add a lowercase letter after the “Number” element of the AMIS record name to distinguish geographies (Example: CIA\_1a, CIA\_1b).

##### 2. Collective Review Markets

If an organization is participating as an Affiliate in a collective review, include “(CR)” before the Target Market type (Example: (CR) LITP\_1).

## **Mapping Requirements**

Target Market maps are required for each customized Investment Area Target Market. If applicable, collective review Target Market components require Target Market maps, too. For each new Targeted Population being requested via the CDFI Certification special determinations process, the creation of a Target Market map is required.

When seeking to obtain the CDFI Certification or, after it becomes a Certified CDFI, in connection with amendments to an approved CDFI Certification market, a new CIMS map must be created in an entity’s AMIS account for each proposed customized Investment Area component in its overall proposed CDFI Certification Target Market or collective review Target Market. The creation of the map allows the

Applicant to identify the associated customized Investment Area geography. Further, CIMS will validate the map(s) as meeting at least one of the standards used to identify an eligible CDFI Certification Investment Area per the CDFI Program interim regulations (12 CFR 1805.201(b)(3)). This type of validation is only accepted by the CDFI Fund when it is conducted using a CIMS map in the CDFI Fund's AMIS system through the Target Market Calculator which enables assessment of whether an acceptable level of eligible Financial Products activity or, if applicable, eligible Financial Services activity has been directed to the qualified census tract(s) in the relevant geography for activity directed to non-qualified tract(s) in that particular area to be accepted as Target Market-directed.

A new CIMS map must also be created in an entity's AMIS account to represent the proposed geography for each new Other Targeted Population not on the CDFI Fund's list of currently recognized Other Targeted Populations via the CDFI Certification special determinations process.

Pre-existing CIMS maps **cannot** be used to represent the geography for proposed customized Investment Areas or new Other Targeted Populations.

CIMS provides mapping and geocoding capabilities to support the CDFI Certification Application and ongoing reporting processes and to assess the eligibility of specific geographies as customized Investment Areas. Through CIMS, entities can upload and process batch geocoding of addresses associated with their Financial Products and Financial Services activity to determine if they fall within an Investment Area.

The name of each customized Investment Area map created in CIMS must match the name of the "Market Name" data field entered in the CDFI Certification Market record in AMIS. If the names do not match exactly and an Applicant has more than one type of customized Investment Area or multiples of the same type, then Target Market activity may not be correctly calculated—which affects whether a CDFI Certification Application can be submitted.

Example: If Organization ABC creates a market record named "NM-CIA\_1" in AMIS for its non-metro customized Investment Area, the same name—"NM-CIA\_1"—must be used as the map name in CIMS.

Refer to the [CIMS user guidance](#) for further information on creating maps in CIMS, but do not follow its naming convention language because it has not yet been updated to reflect the revised naming convention detailed above.

### **Compiling CDFI Certification Target Market Data**

Entities seeking to obtain or maintain CDFI Certification must present data on their eligible Financial Products origination activity to demonstrate their compliance with the CDFI Certification Target Market requirements. If applicable, because the Financial Products and Financial Services option has been selected for the Target Market test, their eligible Financial Services activity in the form of the unique depository account holders data must also be presented. The data is presented to the CDFI Fund by the Applicant using Transaction Level Reports (TLR[s]) (unless they are DIHC(s) that do not directly engage in any eligible Financial Products or, if applicable, applicable eligible Financial Services activity). A separate and individual TLR also must be submitted for each entity relevant to their CDFI Certification collective review process that engages in eligible Financial Products or, if applicable based on the primary entity under review's chosen method of meeting the CDFI Certification Target Market benchmark requirements, applicable eligible Financial Services activity.

For CDFI Certification Application purposes, Applicants must have completed the relevant TLR(s) prior to filling out the CDFI Certification Application form.

## **Transaction Level Report (TLR)**



### **[CLARIFYING UPDATE 07/05/2025]**

For CDFI Certification purposes, all references to the transaction level report (TLR) include (1) the abbreviated TLR which is completed for CDFI Certification purposes for entities that are not submitting a TLR to the CDFI fund for the relevant CDFI Certification-related review timeframe in connection with CDFI Fund Community Development Financial Institution/Native American CDFI (CDFI/NACA) programs, CDFI Rapid Response program (CDFI RRP), or CDFI Equitable Recovery program (CDFI ERP) funding and (2) the full-length TLR which is completed by entities that are recipients of CDFI Fund funding that have a TLR reporting requirement and which is also used for CDFI Certification purposes for entities that are submitting a full-length TLR for the relevant CDFI Certification-related review timeframe in connection with CDFI fund CDFI/NACA program, CDFI RRP, or CDFI ERP funding.

The TLR is a data collection tool that provides a method to evaluate the extent to which an entity, seeking to obtain or maintain CDFI Certification both individually and along with, if applicable, the entity(ies) relevant to its CDFI Certification collective review, collectively serves communities and populations that lack adequate access to capital or Financial Services with its eligible Financial Products and, as allowed, its applicable eligible Financial Services activity. Data provided through the TLR is used to determine the share of an entity's eligible Financial Products and, as allowed, its applicable eligible Financial Services activity that is deployed to its allowable CDFI Certification Target Market or collective review Target Market component(s). If an entity seeking CDFI Certification is not meeting the required Target Market benchmarks, it will not be allowed to submit a CDFI Certification Application. For additional information on the abbreviated TLR, which is completed for CDFI Certification purposes for entities that do not need to complete a TLR for the relevant CDFI Certification-related review timeframe in connection with CDFI Fund Community Development Financial Institution/Native American CDFI (CDFI/NACA) Program, Rapid Response Program (RRP) or Equitable Recovery Program (ERP) funding, review the related [Abbreviated Transaction Level Report Guide](#). For additional information on the long form TLR, review the related [Full Length Transaction Level Report Guide](#).

<b>NOTE</b>	<p>For CDFI Certification purposes, except as otherwise noted (e.g., in connection with CDFI Certification Applications submitted by Spin-off entities), data presented in a TLR under a particular entity's name can only include the eligible Financial Products origination activity for which that particular entity was named as a financing entity of record in the associated transaction closing documents. If the Financial Products and Financial Services option has been selected for the Target Market test where applicable, the relevant eligible Financial Services activity reported in the TLR can only be for those unique depository account holders directly held by the entity. If the entity seeking to obtain or maintain CDFI Certification is subject to the CDFI Certification collective review, an individual, entity-specific TLR must be submitted for each entity relevant to the collective review process that directly engages in eligible Financial Products or, if applicable, eligible Financial Services activity.</p> <p>For DIHC(s) seeking to obtain or maintain CDFI Certification or for entities (including DIHC[s]) relevant to another entity's CDFI Certification collective review process, a TLR will not be submitted under the name of such entities if they did not engage in any direct eligible Financial Products or, if applicable, eligible Financial Services activity during the relevant CDFI Certification review timeframe. A TLR must be submitted under the name of such entities (including DIHC[s]) even if they do not directly engage in any eligible Financial Products activity, if they are involved in a CDFI Certification Target Market review for which the Financial Products and Financial Services option is being used for the Target Market benchmark test and they do engage in applicable eligible Financial Services activity.</p>
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Once the Applicant has submitted its final certified TLR data and has run the Target Market calculator, AMIS will display an overall tabulation of the proportion of the new Financial Products originations or purchases, as well as the Financial Services unique account holder services (if applicable) directed to qualified IA(s) or Targeted Populations based on the Applicant's proposed CDFI Certification Target Market and, if applicable, the CDFI Certification collective review market of all entities relevant to its collective review process. This information will be populated into the CDFI Certification Application to assess whether the organization meets the minimum Target Market activity thresholds required for obtaining CDFI Certification. If the minimum Target Market activity thresholds are not met, the Applicant will not be able to submit the CDFI Certification Application.

During review of the TLR(s), if the data reported is deemed incomplete, inaccurate, incorrect, or invalid, the CDFI Fund may follow up for clarification to verify the issue. The CDFI Fund will generally base its review of a particular CDFI Certification Application, amendment request, or Annual Certification and Data Collection Report (ACR) on the TLR(s) required to be used in connection with that submission as it stood when the relevant Application, amendment request, or ACR was submitted. If the applicable TLR(s) was not properly presented as of the relevant Application, amendment request, or ACR submission date, the Application or amendment request will generally be denied based on the TLR issue(s). The CDFI Certification will generally be put into a cure status. For CDFI Certification Applications or amendment requests, in cases where an improperly presented TLR is corrected, the corrected TLR can only be used in connection with a subsequent Application or amendment request.

Data on Financial Products activity presented for review in connection with the Target Market requirements must be submitted in the TLR based on the date the Financial Products transactions were

closed. In the case of active, outstanding loan purchases, data on Financial Products activity should be based on the date the bundle of loans was purchased.

All eligible Financial Products transactions originated during the reporting timeframe should be included in the Financial Products activity data, even if they no longer appear on-balance sheet for the reporting entity (perhaps because they have been sold or were paid off by the last day of the reporting fiscal year).

Even if related funds were not disbursed on that date or were not eventually fully disbursed, the transaction amounts must be the total amount of financing approved.

For loan purchases, the CDFI Fund accepts all loan purchases as eligible Financial Products activity. The CDFI Fund accepts loans purchased from Certified CDFI(s) towards meeting the Target Market benchmark requirements if an OTP – Certified CDFI(s) market component is an allowed part of the overall CDFI Certification Target Market or, if applicable, collective review Target Market and loans purchased from entities not Certified as CDFI(s) as Financial Products. Loan purchases should be presented for review in connection with the Target Market requirements as follows:

- All loan purchases closed during the relevant review timeframe must be presented as eligible Financial Products activity.
- Loans purchased *from Certified CDFI(s)*, whether purchased individually or in a bundle, can be counted towards meeting the CDFI Certification Target Market benchmark requirements as long as an “OTP – Certified CDFI(s)” Target Market component is an allowed part of the overall CDFI Certification Target Market or, if applicable, as a component in the Target Market for an entity(ies) relevant to the CDFI Certification collective review Target Market assessment. Each bundled loan purchase from a Certified CDFI will count as a single Financial Products transaction.
- Loans purchased *from entities that do not have the CDFI Certification* can be counted towards meeting the CDFI Certification Target Market benchmark requirements if the eligible transaction(s) was directed to an allowable market component in the CDFI Certification Target Market for the primary entity under review or, if applicable, an entity’s collective review Target Market are recognized as Financial Products directed to the Target Market(s) of the original borrowers. Applicants that purchase Target Market loans from non-Certified CDFI entities in a bundle may count each of the purchased loans as a single Financial Products transaction.

For the purpose of the CDFI Certification collective review, all eligible Financial Products activity that has been selected for the Target Market test and is engaged in by an entity relevant to the CDFI Certification collective review process must be presented all together along with all eligible activity engaged in by the primary entity under review. The presented activity must include all applicable eligible Financial Services activity. Target Market-directed activity for each entity relevant to the collective review process is determined based solely on the CDFI Certification collective review market selected for its own use for the collective review of the applicable primary entity.

See information on the CDFI Certification collective review process above for more information on this.

## **Financial Products and Financial Services Activity by Target Market Component**

Data on the Applicant's eligible Financial Products and, if applicable, eligible Financial Services activity, will be collected in the TLR. The data must include all eligible Financial Products transactions, by number and dollar amount, that were closed by the Applicant during its most recently completed fiscal year. Eligible Financial Services activity, if applicable, will include all deposit accounts held as of the last day of the most recently completed fiscal year. Transactions provided to the Applicant's proposed Target Market component(s) must be identified in the TLR in order to count toward the Target Market benchmark requirements. For the Applicant to be approved for a Target Market component, the Applicant will need to demonstrate that it has the needed accountability to that market component and to its overall Target Market using an allowed method and source(s) of Accountability.



### ***Collective Review***

Data on eligible Financial Products and, if applicable, eligible Financial Services activity, of each entity relevant to the Applicant's CDFI Certification collective review will be collected in the TLR. The data must include all eligible Financial Products transactions, by number and dollar amount, that were closed by each entity relevant to the Applicant's CDFI Certification collective review process during each such entity's own most recently completed fiscal year. Eligible Financial Services activity, if applicable, will include all deposit accounts held as of the last day of the most recently completed fiscal year. Transactions provided to support the collective review market component(s) for an entity relevant to the Applicant's CDFI Certification collective review process must be identified in the TLR in order to count toward the Target Market benchmark requirements. For an entity relevant to the Applicant's CDFI Certification collective review process to be approved to support a collective review market component identified in the TLR, the relevant entity will need to demonstrate that it has the needed accountability to that market component and to its collective review market using an allowed method and source(s) of Accountability.

## **Completing the CDFI Certification Application**

To complete the Target Market section of the CDFI Certification Application, an Applicant will:

- Create a new CDFI Certification market record(s) in the CDFI Certification Market section of its AMIS account to represent each component it proposes to include in its CDFI Certification Target Market for which it can demonstrate the needed Accountability.
- If applicable, create a new CDFI Certification collective review market record(s) in the CDFI Certification Market section of the AMIS account for each Affiliate or other entity relevant to its CDFI Certification collective review process. The records(s) must represent each component the Applicant proposes to include in the CDFI Certification collective review market that the other entity(ies) will use for the Applicant's Target Market or Accountability tests for which that other entity(ies) can demonstrate the needed Accountability.
- The CDFI Certification collective review market for an entity relevant to another entity's collective review process can take two forms. The first form is the allowed CDFI Certification Target Market for the primary entity under review. The second form is a Target Market component(s) that has been formally identified for the entity relevant to the collective review's own use in connection with the

applicable primary entity’s collective review process. Regardless of the form selected, an entity relevant to the collective review in connection with a particular primary entity’s review process must be used solely and consistently by the relevant related entity for that primary entity’s collective review process for the Target Market (if applicable because relevant eligible financing is engaged in) and Accountability tests.



- Applicant should create a new CIMS map in its AMIS account for each customized Investment Area included in its CDFI Certification Target Market or, if applicable, in the AMIS account of each entity relevant to its CDFI Certification collective review process that has a customized Investment Area(s) in a CDFI Certification collective review market to: 1) identify the associated customized Investment Area geography; and 2) to validate it as meeting at least one of the standards used to identify an eligible CDFI Certification Investment Area per the CDFI Program interim regulations (12 CFR 1805.201(b)(3). Note, this type of validation is only accepted when conducted using a CIMS map in the CDFI Fund’s AMIS system), and to assess if an acceptable level of Financial Products activity has been directed to the qualified census tract(s)/county(ies) in the relevant geography for activity directed to non-qualified tract(s)/county(ies) in the area to be accepted as Target Market-directed.
- Applicant should create and certify a TLR to be used for CDFI Certification Application purposes for itself (unless it is a DIHC that does not engage in any eligible Financial Products activity nor, if applicable based on its chosen method of meeting the CDFI Certification Target Market benchmark requirements, offer any applicable eligible Financial Services (i.e., eligible deposit accounts).
- If applicable, create and certify a TLR to be used for CDFI Certification Application purposes for the following: 1) each Affiliate or other entity relevant to its CDFI Certification collective review process that engages in eligible Financial Products activity or, 2) if applicable based on the Applicant’s chosen method of meeting the CDFI Certification Target Market benchmark requirements, offers any applicable eligible Financial Services (i.e., eligible deposit accounts).
- Complete the non-auto populated Target Market section field(s).
- Attach copies of all required documentation.
- Confirm that as of the date the CDFI Certification Application will be submitted all TLR data is valid (includes that it reflects most recently completed fiscal year information).

<b>NOTE</b>	CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.
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<b>NOTE</b>	<p>If, as of the date the CDFI Certification Application will be submitted or at the time of CDFI Certification Application submission, the data in a certified TLR intended to be used for CDFI Certification Application purposes no longer reflects the actual most recently completed fiscal year information, then the TLR data is invalid for CDFI Certification purposes. For example, a new fiscal year has ended for the Applicant since the TLR data was originally uploaded/entered into AMIS. The situation is also applicable for an entity relevant to the Applicant’s CDFI Certification collective review process which requires TLR submission from all relevant entities. The Applicant should not submit the CDFI Certification Application because it will be declined. Contact the CDFI Fund’s Office of Certification Policy and Evaluation (OCPE) for assistance via a Service Request in AMIS.</p>
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### 5.7.1. Target Market (Application Subsection)

#### Applicant– Proposed Target Market — (TM) Data Fields

**Before an Applicant completes the Target Market fields in the CDFI Certification Application, it must:**

- Create a new CDFI Certification Market record(s) in the CDFI Certification Market section of its AMIS account to represent each component of its CDFI Certification Target Market (note that Targeted Population types are each considered separate Target Market components). Pre-existing CDFI Certification market records in an entity’s AMIS account, including those that are in an approved, rejected, or previously approved/historical status cannot be used to represent components in the proposed Target Market.
- If applicable, create a new CDFI Certification market record(s) in the CDFI Certification Market section of the AMIS account for each Affiliate, or other entity relevant to its CDFI Certification collective review process, to represent the CDFI Certification market component(s) that the other entity(ies) will use for the collective review of the Applicant in connection with the Target Market and Accountability tests (note that Targeted Population types are each considered separate CDFI Certification market components). Pre-existing CDFI Certification market records in an entity’s AMIS account, including those that are in an approved, rejected, or previously approved/historical status cannot be used to represent components in the proposed collective review market.

Field	TM01	Field Type	Picklist
Field Label/Question Text	Identify a proposed Target Market.		
Response	Select at least one: <ul style="list-style-type: none"> <li>• Investment Area – Pre-qualified</li> </ul>		

	<ul style="list-style-type: none"> <li>• Investment Area – Customized</li> <li>• Investment Area – Non-Metro Customized</li> <li>• Investment Area – Non-Metro counties/parishes</li> <li>• Low-Income Targeted Population</li> <li>• Other Targeted Population – African American</li> <li>• Other Targeted Population – Hispanic</li> <li>• Other Targeted Population – Native American</li> <li>• Other Targeted Population – Native Alaskan</li> <li>• Other Targeted Population – Native Hawaiian</li> <li>• Other Targeted Population – Other Pacific Islander</li> <li>• Other Targeted Population – Filipino</li> <li>• Other Targeted Population – Vietnamese</li> <li>• Other Targeted Population – Persons with Disabilities</li> <li>• Other Targeted Population – Certified CDFI(s)</li> </ul>
<b>Response Instruction(s)</b>	
<p>Select the appropriate response, one at a time, to identify the Target Market component being proposed for the Applicant as part of the CDFI Certification Application that has been verified using at least one of the related approved CDFI Certification Target Market Assessment Methodologies and “certified” as the final Target Market directed transaction in the Transaction Level Report.</p> <p>If the information being entered is for the Applicant, by proposed Target Market, the CDFI Fund means a proposed CDFI Certification Target Market component.</p> <p>If the information being entered is for an entity relevant to the Applicant’s CDFI Certification collective review, by proposed Target Market, the CDFI Fund means a proposed component in the CDFI Certification collective review market that will be used by the relevant entity for the purposes of the Applicant’s collective review process.</p> <p>If entering information for an entity relevant to the Applicant’s collective review process, the selected Target Market component should be one from the CDFI Certification collective review market selected for that relevant entity’s use in connection with the Applicant’s collective review. The CDFI Certification collective review market for an entity relevant to another entity’s collective review process can be either the allowed CDFI Certification Target Market for the primary entity under review or a Target Market component(s) that has been formally identified for the entity relevant to the collective review’s own use in connection with the applicable primary entity’s collective review process.</p>	

<b>Field</b>	<b>TM01.1</b>	<b>Field Type</b>	Look-up.
<b>Field Label/Question Text</b>	Select the CDFI Certification Market Record		
<b>Response</b>	Select one CDFI Certification Market Name for the proposed Target Market component in AMIS		
<b>Response Instruction(s)</b>			
<p>Use the look-up function to find the CDFI Certification Market record that represents the proposed CDFI Certification Market component.</p> <p>The Applicant must create a <b>new CDFI Certification Market record(s) in AMIS when it is preparing its CDFI Certification Application to represent each component in its CDFI Certification Target Market and, if applicable, in the CDFI Certification collective review market for each entity relevant to its collective review process. Pre-existing CDFI Certification Market records in an entity’s AMIS account (including those that are in an approved, rejected, or previously approved/historical status) cannot be used to represent components in a Target Market being proposed for CDFI Certification Application purposes.</b></p> <p>The CDFI Certification Market record must be named using the CDFI Certification Market record naming convention described in the <a href="#">Records</a> subsection in the Target Market section of this guidance manual.</p>			
<b>Field</b>	<b>TM02</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	If the proposed Target Market is a customized Investment Area, identify the map that represents the customized Investment Area, including both qualified and non-qualified census tracts and non-metro counties/parishes.		
<b>Response</b>	Enter map name.		
<b>Response Instruction(s)</b>			
<p>Enter the name of the qualified customized Investment Area map created in CIMS.</p> <p>The Applicant must create a new CIMS map in its AMIS account when it is preparing its CDFI Certification Application to represent each proposed customized Investment Area. Pre-existing CIMS maps cannot be used to represent customized Investment Areas being proposed for CDFI Certification Application purposes.</p> <p>The map representing a customized Investment Area must be created using geographic units from the census data set for the timeframe currently in use by the CDFI Fund. Verify the census data set currently in use for CDFI Certification purposes.</p>			

<b>TM03</b>	<i>If the proposed Target Market is an Investment Area:</i>		
<b>Field</b>	<b>TM03.1</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	What type(s) of Financial Product(s) and/or Financial Service(s) is needed within the Investment Area, but is not currently available at a level sufficient to meet the need?		
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• Consumer loans</li> <li>• Non-real estate business loans</li> <li>• Non-Real Estate Microenterprise loans</li> <li>• Equity Investments</li> <li>• Home purchase loans</li> <li>• Home Improvement loans</li> <li>• Real estate–Construction/Permanent/Acquisition w/o Rehab Commercial loans</li> <li>• Real estate–Construction/Housing Multi-Family loans</li> <li>• Real estate–Construction/Housing Single-Family loans</li> <li>• Real estate Rehabilitation– Commercial</li> <li>• Real estate Rehabilitation/Housing Multi-Family rehab loans.</li> <li>• Real estate Rehabilitation/Housing Single-Family rehab loans.</li> <li>• Access to affordable Financial Services (Depository Institutions only)</li> <li>• Other</li> </ul>		
<b>Response Instruction(s)</b>			
If the Applicant proposed “Investment Area – Pre-qualified,” “Investment Area – Customize.,” “Investment Area – Non-Metro Customized,” or “Investment Area – Non-Metro counties/parishes” in TM03, select the appropriate response(s) that identifies the type(s) of Financial Product(s) and/or Financial Service(s) needed within the Investment Area, but is not currently available at a level sufficient to meet the need.			
<b>Field</b>	<b>TM03.1a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	If “Other,” explain.		
<b>Response</b>	Provide explanation.		
<b>Response Instruction(s)</b>			
If “Other” is selected in TM03.1, fully explain the “other” type(s) of Financial Product(s) and/or Financial Service(s) to sufficiently meet the need within the Investment Area.			

Field	TM03.2	Field Type	Narrative
Field Label/Question Text	Indicate the basis for the Applicant’s determination that there exists a significant need for the Financial Products and/or Financial Services identified within the Investment Area for which is currently insufficiently being met.		
Response	Provide narrative		
Response Instruction(s)			
<p>The Applicant must fully describe the basis for the Applicant’s determination that there exists a significant need for the Financial Products and/or Financial Services identified within the Investment Area and that such needs are currently not being met.</p> <p>The Applicant must explain why there is a significant need for the identified Financial Products and/or Services in the Investment Area and why it is available to meet that need.</p>			
Field	TM04	Field Type	Picklist
Field Label/Question Text	If the Applicant selected “New Targeted Population” in question TM01, has the new-Targeted Population been pre-approved by the CDFI Fund?		
Response	Yes or No		
Response Instruction(s)			
<p>If “New Targeted Population,” is selected in TM01, select the appropriate response to indicate whether the new Targeted Population has been pre-approved by the CDFI Fund via an Applicant’s Section Zero submission.</p> <p><b>If “No,”</b> the Applicant cannot include the propose Targeted Population as Target Market directed financing activity in the TLR or identify it as a proposed Targeted Population picklist.</p>			
Field	TM04.1	Field Type	Text
Field Label/Question Text	Enter the name of the new Targeted Population exactly as it appears in the approval letter from the CDFI Fund.		
Response	Enter name.		
Response Instruction(s)			
<p><b>If “Yes,”</b> to question TM04, enter the name of the new Targeted Population, approved by the CDFI Fund, exactly as it appears in the decision notification for a determination proposed in “Section Zero” of the CDFI Certification Application.</p>			

<b>Field</b>	<b>TM05</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Is the Applicant proposing multiple Target Markets?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the Applicant is proposing more than one Target Market component to meet the Target Market threshold requirement.  <b>If “Yes,”</b> the Applicant will need to repeat the Target Market data entry for each proposed Target Market component.</p>			
<b>Field</b>	<b>TM06</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant propose to use the Financial Services option to meet the required Target Market activity threshold?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the Applicant is proposing to use the Financial Services option to meet the Target Market threshold requirement.                      Regulated entities are the only organization types allowed to include Financial Service activity to meet the Target Market threshold requirement.</p>			
<b>Field</b>	<b>TM07</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p><u>Target Market assessment methodology attestation – Financial Product(s) and/or Financial Service(s):</u>                      Applicant attests that only a CDFI Fund-approved Target Market assessment methodology(ies) was and will continue to be used to determine whether Financial Product transactions and/or depository accounts have been directed to an eligible Target Market.</p>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to confirm whether the Applicant has complied with and will continue to comply with a CDFI Fund-approved CDFI Certification Target Market Assessment Methodology(ies) to determine Target Market directed Financial Products and/or depository accounts.</p> <p><b>[CLARIFYING UPDATE 07/05/2025]</b></p>			

For a Non-Certified CDFI Applicant, the attestation in TM07 must signify that all of the Target Market activity reported in its TLR was assessed using one or more of the approved methodologies that it identifies in its response to TM08.

Currently Certified CDFIs that have been using a Target Market Assessment Methodology other than one that appears on the list of pre-approved methodologies may use the grace period until their Application submission deadlines to request approval of that methodology or to adopt one or more of the CDFI Fund’s pre-approved methodologies. For a currently Certified CDFI, the attestation in TM07 must signify that the CDFI has begun using – and will continue to use – one or more of the CDFI Fund’s approved Target Market Assessment Methodologies that it identifies in its response to TM08 as of the time it submits its Application for CDFI Certification under the revised standards.

Field	TM08	Field Type	Picklist
Field Label/Question Text	Identify the Target Market assessment methodology(ies) used by the Applicant.		
Response	Select all that apply: <ul style="list-style-type: none"> <li>• OTP-AA.1: Self-Report</li> <li>• OTP-AA.2: Visual/Surname</li> <li>• OTP-Hisp.1: Self-Report</li> <li>• OTP-Hisp.2: Visual/Surname</li> <li>• OTP-Native American.1: Self-Report</li> <li>• OTP-Native American.2: Tribal Identification Verification</li> <li>• OTP-Native Alaskan.1: Self-Report</li> <li>• OTP-Native Alaskan.2: Tribal Identification Verification</li> <li>• OTP-Native Hawaiian.1: Self-Report</li> <li>• OTP-Native Hawaiian.2: Origins Identification Verification</li> <li>• OTP-Pacific Islander.1: Self-Report</li> <li>• OTP-Filipino.1: Self-Report</li> <li>• OTP-Vietnamese.1: Self-Report</li> <li>• OTP-PWD.1: Self-Report</li> <li>• OTP-PWD.2: Visual/Auditory/Documentation</li> <li>• OTP-PWD.3: Technology/ Accessibility</li> <li>• OTP-PWD.4: Legal Guardianship/Caretaker Documentation</li> <li>• OTP-Certified CDFI.1: Certified CDFI</li> <li>• LITP.1: Documented Full Family Income</li> <li>• LITP.2: Programmatic Proxy</li> <li>• LITP.3: Self-Reported Family Income</li> <li>• LITP.4: Documented Underwriting Income and Default Family Size</li> <li>• LITP.5 Organization Proxy</li> <li>• LITP.6: Housing Unit Income Restrictions</li> <li>• IA.1: Residence</li> <li>• IA.2: Project/Service</li> </ul>		

Response Instruction(s)			
<p>Select the appropriate response(s) that identifies the pre-approved CDFI Certification Target Market Assessment Methodology(ies) used to determine whether eligible Financial Products and, if applicable, eligible deposit account activity was directed to the specific Target Market component. While the label/question for this field indicates that it only pertains to Applicants, it will also be responded to, if applicable, for each entity relevant to the Applicant’s CDFI Certification review that engaged in eligible Financial Products and/or, if applicable, eligible Financial Services activity during the relevant review timeframe.</p> <p>If no eligible Financial Products and/or, if applicable, eligible Financial Services activity was directed to a particular market component during the relevant review timeframe (will typically be the most recently completed fiscal year), indicate the CDFI Certification Target Market Assessment Methodology(ies) that will be used to assess the level of activity directed to that market component moving forward.</p> <p>Refer to the <a href="#">Pre-approved CDFI Certification Target Market Assessment Methodologies</a> , for details.</p> <p>An Applicant will not be limited to using only the selected Assessment Methodology(ies) moving forward. Any approved CDFI Certification Target Market Assessment Methodology may be used at any time, but an Applicant must identify the one(s) it actually utilized when assessing what eligible Financial Products and, if applicable, eligible Financial Services transactions should be counted as having been directed to 1) a particular CDFI Certification Target Market. 2) for entities relevant to the CDFI Certification collective review process, a collective review market component in connection with the eligible Financial Products or, 3) if applicable, eligible Financial Services activity data presented for CDFI Certification Application purposes and/or that, when the CDFI Certification Application is submitted, it expects to utilize.</p>			
<b>Field</b>	<b>TM08.1</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	<p><b>If “LITP.2”</b> (programmatic proxy), identify the Low-Income programmatic proxy.</p>		
<b>Response</b>	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• Child and Adult Care Food Program (CACFP)</li> <li>• Children’s Health Insurance Program (CHIP)</li> <li>• Food Distribution Program on Indian Reservations (FDPIR)</li> <li>• Head Start Program</li> <li>• HOME Investment Partnership Program (HOME)</li> <li>• HUD Public Housing</li> <li>• HUD Section 8 Housing Choice Voucher Program</li> <li>• Job Corps Program</li> <li>• Lifeline Discounted Phone Program</li> <li>• Medicaid Program</li> <li>• National School Lunch Program (NSLP)</li> <li>• Pell Grants for Higher Education</li> <li>• School Breakfast Program (SBP)</li> <li>• Social Security Disability Insurance (SSDI)</li> </ul>		

				<ul style="list-style-type: none"> <li>• Special Supplemental Nutrition Program for Woman, Infants, and Children (WIC)</li> <li>• Summer Food Service Program (SFSP)</li> <li>• Supplemental Nutrition Assistance Program (SNAP)/Food Stamps</li> <li>• Supplemental Security Income (SSI)</li> <li>• Temporary Assistance for Needy Families (TANF)</li> <li>• USDA Single Family Housing Direct Home Loans (Section 502 Direct Loan Program)</li> </ul>
<b>Response Instruction(s)</b>				
If <b>“LITP.2”</b> is selected in TM08, select the appropriate response(s) to identify all CDFI Fund pre-approved programmatic proxies used to determine activity to the Low-income Targeted Population.				
<b>Field</b>	<b>TM08.2</b>	<b>Field Type</b>	Picklist	
<b>Field Label/Question Text</b>	If <b>“LITP.5”</b> (Organization Proxy), identify the Low-Income organization proxy.			
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• Federal Qualified Health Centers (FQHC)</li> <li>• Free and Charitable Clinics</li> <li>• Homeless Service Providers</li> <li>• Rural Health Clinics (RHC)</li> <li>• School-Based Health Centers (SBHC)</li> </ul>			
<b>Response Instruction(s)</b>				
If <b>“LITP.5”</b> is selected in TM08, select the appropriate response(s) to identify all CDFI Fund pre-approved organization proxies used to determine activity to the Low-income Targeted Population.				
<b>TM08.3</b>	If <b>“Separately approved assessment methodology”</b> :			
<b>Field</b>	<b>TM08.3</b>	<b>Field Type</b>	Text	
<b>Field Label/Question Text</b>	If <b>“Separately approved assessment methodology”</b> : identify the name of the Target Market assessment methodology(ies) that was separately approved by CDFI Fund.			
<b>Response</b>	Enter Name.			
<b>Response Instruction(s)</b>				
If <b>“Separately approved assessment methodology”</b> is selected in TM08, enter the name of the Target Market Assessment Methodology(ies) that was separately approved exactly as it appears in the approval letter from the CDFI Fund.				

### 5.7.2. Target Market – General Eligible Financial Products or Eligible Financial Services Activity Information

#### **Target Market – General Eligible Financial Products or Eligible Financial Services Activity Information – (TM-G) Data Fields**

<b>Field</b>	<b>TM-G01</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Identify the Financial Product transaction types closed by the Applicant during its most recently completed fiscal year?		
<b>Response</b>	The Financial Product types will auto-populate based on information provided in BI-FP03.		
<b>Response Instruction(s)</b>			
TM-G01 displays the options selected from the picklist in BI-FP03.			
<b>Field</b>	<b>TM-G02</b>	<b>Field Type</b>	Auto populated
<b>Field Label/Question Text</b>	Does the Financial Product activity data include any other similar financing that does not appear on the approved list of Financial Products?		
<b>Response</b>	Auto populated based on response to BI-FP04		
<b>Response Instruction(s)</b>			
TM-G02 shows the response selected in BI-FP04.			


### 5.7.3. Target Market – Depository Institutions (ONLY)

This subsection is visible **only** to Regulated Institutions, based on their Financial Institution Category. Question TM-G03 will be asked only of Depository Institution Applicants that have selected to use Financial Services to meet the Target Market test.

#### **Target Market – Depository Institutions (ONLY) – (TM-G) Data Fields**

<b>Field</b>	<b>TM-G03</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Identify all of the Financial Services account types which the Applicant’s depository account holders had open as of the last day of the last full month completed prior to submission of the CDFI Certification Application.		

<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>Savings/Share Accounts</li> <li>Checking Accounts</li> <li>Certificates of Deposit</li> <li>Money Market Accounts</li> </ul>
<b>Response Instruction(s)</b>	
Select the response(s) that identifies all of the Financial Services account types that the Applicant’s depository account holders had open as of the last day of the Applicant’s most recently completed full 12-month fiscal year.	
While the label/question for this field indicates that information about the types of depository accounts open should reflect the status as of the last day of the last full month completed just prior to submission of the CDFI Certification Application, the response should actually be based on the status as of the last day of the relevant entity's most recently completed 12-month fiscal year.	

	<p><b><u>TARGET MARKET – COLLECTIVE REVIEW</u></b></p> <p>For Applicants subject to the CDFI Certification collective review: If the CDFI Certification Application form does not allow CDFI Certification collective review market records to be linked to the Application form for each entity relevant to the Applicant’s collective review process, attach a document to field BI21 in the Basic Information section of the Application that lists each relevant entity and identifies the market record(s) in that entity’s AMIS account that represent the market it will use in connection with the Applicant’s CDFI Certification review.</p> <p><b>Name the attachment: “Collective review market – entity or entities relevant to collective review.”</b></p>
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### 5.7.4. Applicant and Relevant Affiliate(s) – Financial Products Activity by Target Market Component (Most Recently Completed Fiscal Year)

**Target Market Activity Summary Table**

The summary table below pulls data from the appropriate fiscal year’s Target Market Calculation Data record and displays that information in this subsection. Applicant and relevant Affiliate(s) data, presented by Financial Products category, will be collected in the TLR. The data must include all Financial Products transactions, by number and dollar amount, that were closed during the Applicant’s most recently completed fiscal year. Transactions provided to the proposed Target Market components must be identified in the TLR to count toward the 60% requirement. To be approved for each Target Market component identified in the TLR, the Applicant must demonstrate the required level of accountable board members, using appropriate sources of accountability Financial Services.

*(Simulated Table – actual display in AMIS may differ)*

Target Market – Applicant and Relevant Affiliate(s) – Financial Products Activity by Financial Products		
Proposed Target Market Financial Products	Target Market Financial Products \$ Volume	Target Market Financial Products #
Total Qualified Financial Products	Auto calculated	Auto calculated
Qualified Transaction %	Auto calculated	Auto calculated
Required Target Market Threshold		
Target Market Threshold met?	Auto display – Yes or No	Auto display – Yes or No

### 5.7.5. Applicant and Relevant Affiliate(s) –Financial Products and Financial Services Activity by Target Market Component (Most Recently Completed Fiscal Year)

Depository Institutions that use Financial Services to meet the Target Market test, because either their Target Market Financial Products dollar volume or their Target Market Financial Products number is between 50% and 59%, must also enter the data for all relevant, unique depository account holders as of the fiscal year end in the TLR.

<b>NOTE</b>	This subsection will appear <b>only if “Yes”</b> is selected in <b>TM06</b> . The summary table below pulls data from the appropriate fiscal year’s Target Market Calculation Data record and displays that information in this subsection.
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Financial Services & Target Market Type (Most Recently Completed Fiscal Year)		
Proposed Target Market Financial Products and Financial Services	Target Market Financial Products \$ Volume	Target Market Financial Products and Financial Services #
Total Qualified Financial Products	Auto display	Auto-display
Total Financial Products	Auto display	Auto-display
Qualified Transaction %		Auto-display
Unique Account Holders	Auto calculated	Auto calculated
Required Target Market Threshold	Auto display – Yes or No	Auto-display – Yes or No

## 5.8. Development Services

### 5.8.1. Development Services Requirements

Development Services are defined in the CDFI Program interim regulations (12 CFR 1805.104) as “activities undertaken by a CDFI, its Affiliate, or contractor that promote community development and shall prepare or assist current or potential borrowers or investees to use the CDFI’s Financial Products or Financial Services.”

Entities seeking to obtain or maintain CDFI Certification must, (except as allowed for entities using the CDFI Certification solely for participation in the CDFI Fund’s Bond Guarantee Program), provide Development Services in the form of formal training, counseling, or technical assistance to promote consumer success with its eligible arm’s length Financial Products or eligible Financial Services activity.

Eligible Development Services can be offered directly by an entity, through an Affiliate, or under contract with a non-Affiliated provider. If an entity provides Development Services through an Affiliate, proof of the Affiliate relationship must be available. Development Services provided by a non-Affiliated provider must be documented through a formal contract, memorandum of understanding or other type of agreement.

An eligible Development Service is a formal structured training, counseling, or technical assistance service that promotes access to, or success with, an entity’s Financial Products and Financial Services. The eligible Development Service must also be offered regularly to eligible clients, have a defined curriculum or written set of goals and objectives, and the outcome of success may be the completion of a specific step that prepares current or potential customers to access or increase their knowledge about the CDFI’s Financial Products and Financial Services.

A Development Service may be delivered in a classroom setting or one-on-one, in person, or online, and with or without a live instructor or facilitator. Development Services delivered without a live instructor or facilitator must be well-developed online trainings with learning modules that include a method of requiring the engagement of viewers and measuring their increased knowledge.

CDFI Certification Applicants must:

- Demonstrate that at least one Development Service is regularly offered to an Applicant’s clients (or for DIHC[s], its Affiliate’s clients) and is provided at least once per year;
- Demonstrate that Development Service(s) provided via contract with a third-party entity or third-party software platform are routinely reviewed and monitored, which may include such activities as determining appropriateness of topics and outcomes, observing sessions with borrowers, or obtaining customer feedback on the Development Service; ***and***
- Clearly identify how the Development Service(s) provided prepares or assists current or potential borrowers or investees to use at least one of the Applicant’s (or, for DIHC[s], an Affiliate’s) Financial Products or Financial Services.

A Development Service is separate and distinct from routine customer service, and includes things such as providing a prospective or existing customer, borrower, or investee information about, or assistance completing, an application for an Applicant’s Financial Products or Financial Services. Development

Services should address subject matter that prepares consumers to access and be successful in using an entity's Financial Products (e.g., first-time homebuyer counseling for prospective mortgage borrowers; financial or credit counseling; or business planning and management assistance) and Financial Services (e.g., financial education that promotes the opening of a depository account or promotes savings).

The Development Service must be directed toward the use of the Applicant's Financial Products or Financial Services and not those of another entity. A CDFI does not need to establish that participants in a Development Service secured financing from the CDFI—only that the Development Service reasonably prepares them to access a Financial Products or Financial Service that the CDFI offers when the Development Service is offered.

For example, homebuyer counseling is a Development Service that may occur well in advance of a client being prepared to access mortgage financing. However, a CDFI may not count housing counseling as a Development Service if the CDFI does not offer a Financial Products or Service related to home purchase.

Depository institution Applicants may identify financial education as a Development Service if the financial education promotes opening a depository account or building savings in an account with the Applicant.

The CDFI Fund does not consider the following activities to be Development Services:

- Responding to routine questions or providing routine explanation or instruction to prospective or existing customers, borrowers, or investees on applying for the Applicant's Financial Products or Financial Services.
- Underwriting completed applications for Financial Products or Services.
- Training, counseling, or providing technical assistance not clearly intended to prepare consumers to access or be successful with a Financial Products offered by the Applicant. Examples of such services include workforce development, parenting training/support groups, and training/counseling intended solely to enable consumers to access financing provided by other entities.
- Making referrals, whether it be to training, counseling, or technical assistance available to services provided at the discretion of other entities.
- Information presented in newsletters, fliers, or online (e.g., the Applicant's website or blog posts and distinct from online training described above).
- Workshops for youth (other than financial education that promotes opening a depository account or building savings in an account with the Applicant).
- Conferences/workshops for broad audiences.
- Presentations made at one-off events (e.g., annual conferences, fairs, or non-recurring events) or at events held by other entities.
- Marketing events/activities.
- Unstructured conversations with consumers on Development Services subject matter. (A series of one-on-one, goal-oriented conversations with consumers that have measurable outcomes, however, may count as Development Services.)

As a rule of thumb, if an activity takes less than 30 minutes to deliver, it is unlikely to meet the definition of a Development Service, though it may be a segment, component, or module in the delivery of a Development Service.

For clarity, the CDFI Fund does not prohibit CDFI(s) from providing services that do not meet the definition of Development Services.

#### Development Services and Entities Using CDFI Certification Solely for Participation in the CDFI Fund's BG Program

Entities applying for CDFI Certification solely for participation as Eligible CDFI(s)<sup>33</sup> in the CDFI Fund's CDFI BG Program may be exempt from Development Services requirements that require training/counseling to be:

- Offered to non-Affiliated, third-party individuals or entities; ***and***
- Provided in connection with Financial Products that the Applicant directly financed at arm's length.

To qualify for this exemption, the training/counseling or the related non-arm's-length financing products or services must be provided to a Controlling Certified CDFI. Such activities must be pursuant to operating agreements that include management and ownership provisions and that are in a form and substance acceptable to the CDFI Fund (see 12 CFR 1805.201(b)(2)(C)(ii-iii)), and the relevant training/counseling must meet all other Development Services requirements.

#### **Completing the CDFI Certification Application Development Services Section**

To complete the Development Services section of the CDFI Certification Application, an Applicant will:

- Review and, if needed, provide or correct any information intended to be auto populated into the CDFI Certification Application Development Services section fields.
- Complete the non-auto populated Development Services section field(s).
- Attach copies of all required documentation.

**NOTE**

CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.

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<sup>33</sup> "Eligible CDFI" means a Certified CDFI that has submitted an application to a Qualified Issuer for a Bond Loan, has been deemed creditworthy based on the Bond Loan Requirements, and has received a Bond Loan.

**Development Services – (DS) Data Fields**

<b>Field</b>	<b>DS01</b>	<b>Field Type</b>	Auto populate
<b>Field Label/Question Text</b>	Does the Applicant seek to use the CDFI Certification provision for BG Program participation to meet the CDFI Certification Development Services requirements?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant seeks to use the CDFI Certification provision for BG Program participation to meet the CDFI Certification Development Services requirements.			
<b>Field</b>	<b>DS01.1</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	<u>If the Applicant seeks to meet the CDFI Certification Development Services requirements using training/counseling it offers to an Affiliated Controlling Certified CDFI:</u>		
	Identify the page number(s) and/or section(s) of the operating agreement between the Applicant and a Controlling Certified CDFI that indicates that the training/counseling activity is provided to the Controlling Certified CDFI and provide the relevant text.		
<b>Response</b>	Enter page number(s) and/or section(s) and provide relevant text.		
<b>Response Instruction(s)</b>			
Direct the CDFI Fund to the exact page number(s) and/or sections of the operating agreement between the Applicant and the Controlling Certified CDFI indicating that the training/counseling activity is provided to the Controlling Certified CDFI and provide the relevant text.			

<b>Field</b>	<b>DS01.2</b>	<b>Field Type</b>	<b>Text</b>
<b>Field Label/Question Text</b>	<p><u>If the Applicant seeks to meet the CDFI Certification Development Services requirements using training/counseling it provides in connection with a financing product(s) it offers on-balance sheet, but to an Affiliated Controlling Certified CDFI:</u></p> <p>Identify the page number(s) and/or section(s) of the operating agreement between the Applicant and a Controlling Certified CDFI, indicating such financing product(s) for which training/counseling is being provided is offered to a Controlling Certified CDFI, and provide the relevant text.</p>		
<b>Response</b>	Enter page number(s) and/or section(s) and provide relevant text.		
<b>Response Instruction(s)</b>			
Direct the CDFI Fund to the exact page number(s) and/or sections of the operating agreement between the Applicant and the Controlling Certified CDFI indicating such financing product(s) for which training/counseling is offered to a Controlling Certified CDFI and provide the relevant text.			
<b>Field</b>	<b>DS01.3</b>	<b>Field Type</b>	<b>Attachment</b>
<b>Field Label/Question Text</b>	Attach the Operating Agreement between the Applicant and a Controlling Certified CDFI.		
<b>Response</b>	Attach Operating Agreement.		
<b>Response Instruction(s)</b>			
Attach the operating agreement between the Applicant and the Controlling Certified CDFI.			
<div style="border: 1px solid black; padding: 5px;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div>			
<b>Field</b>	<b>DS02</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Identify the purpose of the Financial Product(s) or Financial Service(s) that is offered by the Applicant and connected to the Development Service being offered by the Applicant.		
<b>Response</b>	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• Home Purchase</li> <li>• Home Improvement</li> </ul>		

	<ul style="list-style-type: none"> <li>• Real Estate – Construction/ Permanent/Acquisition without Rehabilitation–Commercial</li> <li>• Real Estate – Construction–Housing–Multi-Family</li> <li>• Real Estate – Construction–Housing–Single Family</li> <li>• Real Estate – Rehabilitation–Commercial</li> <li>• Real Estate – Rehabilitation–Housing–Multi-Family</li> <li>• Real Estate – Rehabilitation–Housing–Single Family</li> <li>• Consumer</li> <li>• Non-Real Estate Business</li> <li>• Non-Real Estate Microenterprise</li> <li>• Checking Account</li> <li>• Savings Account</li> <li>• Other</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response(s) that identify the purpose of the Financial Product(s) or Financial Service(s) that is offered by the Applicant and connected to the Development Service being offered by the Applicant.			
<b>Field</b>	<b>DS02.1</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	If “Other,” describe the Financial Product or Financial Service.		
<b>Response</b>	Provide narrative		
<b>Response Instruction(s)</b>			
If “Other” is selected in DS02, enter the “other” purpose for the Financial Product(s)/Financial Service(s) and describe the connection to the Development Service being offered by the Applicant. The Applicant must convey the eligibility determinations approved by the CDFI Fund via Section Zero.			
<b>Field</b>	<b>DS03</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Identify the topic of a Development Service currently offered by the Applicant (directly or through another provider/resource) to un-Affiliated third parties that promotes success with at least one of the Applicant’s Financial Products or Financial Services.		
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• Financial Education/Financial Literacy</li> <li>• Credit-Building</li> <li>• Financial Management</li> <li>• Small Business Development</li> <li>• Homeownership Counseling/Foreclosure Prevention</li> </ul>		

	<ul style="list-style-type: none"> <li>Nonprofit Capacity Building</li> <li>Affordable Housing/Commercial Real Estate Development</li> <li>Basic Banking Skills</li> <li>Financial Management/Budgeting</li> <li>Banking for businesses</li> <li>Other</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response(s) that identifies the topic of a Development Service currently offered by the Applicant (directly or through another provider/resource) to un-Affiliated third parties which promotes success with at least one of the Applicant’s Financial Products or Financial Services.</p>			
<b>Field</b>	<b>DS03.1</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	<p><b>If “Other,”</b> describe the topic and explain how it is relevant as a Development Service.</p>		
<b>Response</b>	Provide narrative		
<b>Response Instruction(s)</b>			
<p><b>If “Other”</b> is selected in DS03, enter the “other” topic and explain how it is relevant as a Development Service.</p> <p>If “Other” is selected in DS03, Applicants must enter the “other” topic and explain how it is relevant as a Development Service.</p> <p>Per regulation, a Development Service must be directed toward the use of the Applicant’s Financial Products or Financial Services and not those of another entity. A CDFI does not need to establish that participants in any Development Service secured financing from the CDFI— only that the Development Service reasonably prepares them to access a Financial Products or Financial Service that the CDFI offers when the Development Service was offered.</p> <p>An eligible Development Service 1) is a formal structured training, counseling, or technical assistance service that promotes access to and/or success with an entity’s Financial Products and Financial Services 2) is offered regularly to eligible clients 3) has a defined curriculum or written set of goals and objectives, and 4) likely entails the outcome of success the completion of a specific step that prepares current or potential customers to access or increase their knowledge about the CDFI’s Financial Products and Financial Services.</p> <p>A Development Service may be delivered in a classroom setting or one-on-one, in person or online, and with or without a live instructor or facilitator. Development Services delivered without a live instructor or facilitator must be well-developed online trainings with learning modules that include a method of requiring the engagement of viewers and measuring their increased knowledge.</p> <p>Applicant will need to outline its approach and detailed planned activities towards achieving the Development Services component. The organization must describe in detail the nature of the technical assistance to be provided and describe the systems in place to deliver these services. This includes identifying the specific financial literacy needs of the target populations and outlining the</p>			

resources, workshops, and strategies that will be utilized to effectively deliver this education. It is imperative that the organization demonstrates a comprehensive understanding of the educational needs of its target community and has a clear plan in place to address these needs.			
<b>Field</b>	<b>DS04</b>	<b>Field Type</b>	<b>Narrative</b>
<b>Field Label/Question Text</b>	Provide a description of the Development Service offered, including format, frequency, and how it prepares the current or potential customers, borrowers, or investees to use at least one of the Applicant’s Financial Products or Financial Services.		
<b>Response</b>	Provide narrative		
<b>Response Instruction(s)</b>			
<p>The Applicant must provide a description of the Development Service offered including format, frequency, and how it prepares the current or potential customers, borrowers, or investees to use at least one of the Applicant’s Financial Products or Financial Services.</p> <p>The Applicant’s eligible Development Service:</p> <ul style="list-style-type: none"> <li>• Is a formal, structured training, counseling, or technical assistance service;</li> <li>• Is offered regularly to eligible clients;</li> <li>• Is provided at least once per year;</li> <li>• Has a defined curriculum or written set of goals and objectives;</li> <li>• If delivered without a live instructor or facilitator: is a well-developed online training(s) with learning modules that include a method of requiring the engagement of viewers and measuring their increased knowledge; and</li> <li>• Is separate and distinct from routine customer service, such as providing a customer with information or assisting a customer in completing an application.</li> </ul>			
<b>Field</b>	<b>DS05</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Identify the entity that provides one or more Development Services.		
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• Applicant</li> <li>• Affiliate(s)</li> <li>• Non-Affiliate(s) (e.g., contractor)</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response(s) that identify that provides one or more Development Services.			
<b>Field</b>	<b>DS05.1</b>	<b>Field Type</b>	<b>Attachment</b>
<b>Field Label/Question Text</b>	If “Non-Affiliate,” provide agreement.		

<b>Response</b>	Attach Agreement(s)		
<b>Response Instruction(s)</b>			
<p>If, <b>“Non-Affiliate,”</b> is selected in DS05, attach all agreements that provides evidence that the relationship and deliverables for the related Development Services.</p> <div style="border: 1px solid black; padding: 5px; background-color: #fff9c4;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div>			
<b>Field</b>	<b>DS05.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the agreement identify the Development Service topics?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the agreement identifies the Development Service topics.                  If <b>“No,”</b> the related Development Service cannot be used.</p>			
<b>Field</b>	<b>DS05.3</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the agreement describe how the contracted third-party entity’s activity is routinely reviewed and monitored?		
<b>Response</b>	Select Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether the agreement describes how the contracted third-part entity’s activity is routinely reviewed and monitored.                  If <b>“No,”</b> the related Development Service cannot be used.</p>			
<b>Field</b>	<b>DS05.4</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the agreement identify the Development Service outcomes?		
<b>Response</b>	Select Yes or No		

Response Instruction(s)			
<p>Select the appropriate response to indicate whether the agreement identifies the Development Service outcome.  <b>If “No,”</b> the related Development Service cannot be used.</p>			
Field	DS05.5	Field Type	Picklist
Field Label/Question Text	Does the agreement identify the number of sessions for the Development Service?		
Response	Select Yes or No		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether the agreement identifies the number of sessions for the Development Service offered.  <b>If “No,”</b> the related Development Service cannot be used.</p>			
Field	DS05.6	Field Type	Picklist
Field Label/Question Text	Does the agreement identify the mechanism for obtaining customer feedback on the Development Service?		
Response	Select Yes or No		
Response Instruction(s)			
<p>Select the appropriate response to indicate whether the agreement identifies the mechanism for obtaining customer feedback on the Development Service offered.  <b>If “No,”</b> the Development Service cannot be used.</p>			
<p><i>A minimum of one Development Service must be offered and presented in the CDFI Certification Application. However, the Applicant may present up to three Development Service activities offered by the Applicant, an Affiliate, or a non-Affiliated third-party. Repeat the data entry for each relevant Development Service.</i></p>			

## 5.9. Accountability

### 5.9.1. CDFI Certification Accountability – General

#### **CDFI Certification Accountability Requirements**

To be a Certified CDFI, an entity must demonstrate accountability to its allowed CDFI Certification Target Market component(s) by having a sufficient level of accountable individuals on its relevant governing board or formal advisory board or, as an option for credit unions only, by having a sufficient level of accountable individuals on an advisory board and having a sufficient level of credit union members that are part of the credit union’s allowed Target Market component(s).

Information used to assess an entity’s accountability for CDFI Certification purposes must be current information that reflects the entity’s current board(s) status based on an as of date that is no more than 45 days old. For CDFI Certification Applicants, this means the information must reflect the entity’s current status as of a single point in time no more than 45 days prior to the submission date of the Application. Submission date is determined by the Eastern time submission time stamp on the Application.

#### **Accountability and the Collective Review Process**



#### ***Collective Review***

**For a DIHC, an Affiliate of a DIHC, or a Subsidiary of an IDI to be certified as a CDFI, it must demonstrate accountability both:**

- **Individually** to its own CDFI Certification Target Market, based on its own Accountability method; ***and***
- **Collectively**, where each entity relevant to its CDFI Certification collective review process must also demonstrate its accountability to either 1) the primary entity under review’s CDFI Certification Target Market or 2) to a Target Market component(s) that has been formally identified for its own use, specifically in connection with the primary entity’s collective review process via its own Accountability method, or 3) an entity that Controls it, even if it has not adopted the board(s) used as a means of Accountability by the Controlling entity as its own board(s), as an option if the entity relevant to the collective review does not engage in its own eligible Financial Products or eligible Financial Services activity.
  - If a Controlling entity will be used to provide accountability for an entity(ies) relevant to a CDFI Certification collective review process, a governing leadership-approved document evidencing the applicable Control relationship must be available.
  - A single Controlling entity can provide accountability for as many entities, relevant to a CDFI Certification collective review process that meet the conditions to use the CDFI Certification collective review process.

- If the Control relationship exists and is needed, the Applicant is allowed to be used as a Controlling entity that provides accountability to entities relevant to its CDFI Certification review that do not engage in any eligible Financial Products or eligible Financial Services activity.

### **Accountability – Methods of Accountability**

Accountability for CDFI Certification purposes may be demonstrated by an entity using one of the following methods:

#### **Option 1: Governing Board Only**

- At least one governing board member is accountable to each component in the entity's CDFI Certification Target Market or, if the entity is relevant to another entity's CDFI Certification collective review process, to each component in its CDFI Certification collective review market; ***and***
- At least 33% of the governing board is accountable to the entity's overall CDFI Certification Target Market or if the entity is relevant to another entity's CDFI Certification collective review process, to its overall CDFI Certification collective review market.

#### **Option 2: Governing Board Supplemented by Advisory Board**

- At least 20% of the governing board is accountable to the entity's overall CDFI Certification Target Market or if the entity is relevant to another entity's CDFI Certification collective review process, to its overall CDFI Certification collective review market;
- At least one advisory board member is accountable to each component in the entity's CDFI Certification Target Market or, if the entity is relevant to another entity's CDFI Certification collective review process, to each component in its CDFI Certification collective review market;
- At least 60% of the advisory board is accountable to the entity's overall CDFI Certification Target Market or if the entity is relevant to another entity's CDFI Certification collective review process, to its overall CDFI Certification collective review market;
- At least one of the entity's governing board members is also a member of the advisory board; ***and***
- The advisory board is established and operates in accordance with an acceptable governing leadership-approved advisory board policy.

#### **Option 3: Advisory Board Supplemented by Credit Union Membership (Credit Unions Only)**

- At least 33% of the entity's credit union members are part of its overall CDFI Certification Target Market or if the entity is relevant to another entity's CDFI Certification collective review process, of its overall CDFI Certification collective review market;
  - As assessed based on the credit union membership as of the last day of the credit union's most recently completed fiscal year using a CDFI Fund-approved CDFI Certification Target Market Assessment Methodology(ies).
- At least one advisory board member is accountable to each component in the entity's CDFI Certification Target Market or, if the entity is relevant to another entity's CDFI Certification collective review process, to each component in its CDFI Certification collective review market;

- At least 60% of the advisory board is accountable to the entity’s overall CDFI Certification Target Market or if the entity is relevant to another entity’s CDFI Certification collective review process, to its overall CDFI Certification collective review market;
  - At least one of the entity’s governing board members is also a member of the advisory board; ***and***
  - The advisory board is established and operates in accordance with an acceptable governing leadership-approved advisory board policy.

**Option 4: Advisory Board Only (DIHC[s], IDI[s], and entities without a formal governing board only)**

- At least one advisory board member is accountable to each component in the entity’s CDFI Certification Target Market or, if the entity is relevant to another entity’s CDFI Certification collective review process, to each component in its CDFI Certification collective review market;
- At least 80% of the advisory board is accountable to the entity’s overall CDFI Certification Target Market or if the entity is relevant to another entity’s CDFI Certification collective review process, to its overall CDFI Certification collective review market;
- At least one of the entity’s governing leaders is also a member of the advisory board; ***and***
- The advisory board is established and operates in accordance with an acceptable governing leadership-approved advisory board policy.

<b>NOTE</b>	<p>All Accountability-related percentages must be met with no rounding of the percentage allowed.</p> <p>If an employee for an entity is also the member of a board being presented by that entity as means of CDFI Certification Accountability, the employee must be included in the overall list of board members presented to the CDFI Fund and counted among the number of overall board members for purposes of determining accountability levels.</p>
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**Accountability – Board Standards**

For a governing board to be accepted as a means of CDFI Certification Accountability, it must be duly established and operating in accordance with the legal or regulatory requirements that apply to the entity it serves. For an advisory board to be accepted as a means of CDFI Certification Accountability, it must be formally established by the governing leadership for the entity the advisory board serves and operating in accordance with any relevant legal and regulatory requirements, as well as a governing leadership-approved advisory board policy.

**For the purposes of CDFI Certification, the CDFI Fund requires that a governing board consist of no less than three active members (i.e., three filled board seats) and that an advisory board consist of no less than five active members (i.e., five filled board seats).**

<b>NOTE</b>	<p><b>Native American CDFI Designation and Accountability</b></p> <p>Entities seeking the Native American CDFI designation will need to present Native American CDFI designation-related Accountability information separately from the Accountability information they provide in connection with the general CDFI Certification.</p>
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	<p>The one Accountability field that needs to be completed in the CDFI Certification Application in connection with the Native American CDFI designation is displayed <b>ONLY</b> in <a href="#">Native American CDFI Designation – Accountability Field</a>. The Accountability-related board, board member, and accountable board member records that must be created and completed by entities applying for the Native American CDFI designation are the same as those that must be completed in connection with the general CDFI Certification. Entities applying for the Native American CDFI designation can, therefore, refer to the fields shown below under CDFI Certification Board, Board Member and CDFI Certification Accountable Member Records for information and instructions on completing board and board member records for Native American CDFI designation-related Accountability purposes. For the CDFI Certification Accountable Member record(s) that need to be created and completed to demonstrate accountability in connection with the Native American CDFI designation, see the information in the <a href="#">Native American CDFI Designation</a> section of this guidance.</p>
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### **Advisory Board Requirements**

An advisory board used as a means of CDFI Certification Accountability must meet the following:

- The advisory board’s role must include providing input to the governing leadership on strategic and policy matters;
- The members of the advisory board must be appointed by a duly documented action of the governing leadership of the entity the board serves;
- The advisory board must be made up of no less than five active members (i.e., five filled seats);
- The advisory board must meet at least three times per year; ***and***
- The advisory board must be established under and operate in accordance with a governing leadership-approved advisory board policy that meets the standards described below.

### ***Advisory Board Policy***

An entity’s advisory board policy can be a stand-alone document or can be incorporated into an entity’s governance or organizing document. An entity’s advisory board policy must be approved by its governing leadership and the relevant document must evidence that approval.

The advisory board policy must clearly address the address the specific board being used as a means of CDFI Certification-related Accountability.

At minimum, an advisory board policy must include a description of the following:

- The number of seats on the advisory board (must be no less than five);
- How often the advisory board meets (must be at least three times per year);
- The purpose of the advisory board and the scope of topics or strategic or policy matters on which the advisory board provides input or advice to the governing leadership;
- The formal mechanism(s) by which the advisory board’s input is conveyed to the governing leadership (for example: regular meetings with the governing leadership, the inclusion of advisory board meeting minutes in governing leadership meeting packets, written reports providing feedback on decisions related to strategic policy matters, etc.);

- The process by which individuals are selected and approved as members of the advisory board (must be appointed by the governing leadership of the entity the advisory board serves); and
- A meaningful process by which the advisory board seeks input from, or reviews data on the financial needs and opportunities for the market(s) for which it provides accountability.

For CDFI Certification Application purposes, the advisory board policy does not need to have been in effect for any specific length of time, but the effective date of the current policy must be as of or prior to the date of submission of the CDFI Certification Application.

**Financial Interest Conflicts with Accountability**

Board members with certain types of financial interest in the entity for which they serve as a board member (either directly or via a family member or unless certain conditions are met, via an employer) may not be considered accountable, as the financial interest may conflict with the board member’s ability to effectively represent the interests of the members of those markets. Governing board and advisory board members who are principals (i.e., individuals who own at least 25% of or otherwise Control an entity, either individually or in combination with other family members) or paid direct employee of entity for which they serve as a board member or its Affiliates, or whose family members are principals or paid direct employees of that entity or its Affiliates, cannot be used to demonstrate accountability. In addition, to avoid a financial interest-related conflict of interest for Accountability purposes, entities with board members who have active Financial Products from them, or whose family members or employer have active Financial Products from them, should have policies requiring such board members to recuse themselves from any decision that may affect, directly or indirectly their Financial Products or relationship. If the needed recusal policy is in place, the board member can be presented as an accountable board member.

For purposes of determining a financial interest-related Accountability conflict, covered family members include spouses, children (including step-, in-law, and adopted children), siblings (including step-, half, and in-law siblings), parents (including step- and in-law parents), and grandparents related by blood or adoption.

**Accountability – Sources of Accountability**

<b>NOTE</b>	An accountable board member must continuously maintain an acceptable source of Accountability, or they can no longer be considered accountable. That is, the fact that a board member was accountable at one point is not sufficient for them to continue to be accepted as accountable.
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For CDFI Certification purposes, the individual accountability of a board member to a component(s) in an entity’s CDFI Certification Target Market or, if the entity is relevant to another entity’s CDFI Certification collective review process, in its CDFI Certification collective review market may be demonstrated in any of the following ways:

**[CLARIFYING UPDATE 07/05/2025]**

Source of Accountability	Description	Requirement(s) needed to be evidenced in Application Submission responses based on the “Description” column
<b>Investment Area (IA)</b>		
<p><b>Primary residence in a qualified census tract.</b></p>	<ul style="list-style-type: none"> <li>For the pre-qualified Investment Area that consists of qualified census tracts anywhere in the United States, its territories, or the District of Columbia, the qualified census tract where the primary residence is can be anywhere within that overall geography.</li> <li>For a customized Investment Areas, the qualified census tract where the primary residence is must be within the geography relevant to the customized Investment Area geography.</li> </ul>	<ul style="list-style-type: none"> <li>FIPS Code (applies to both bullet points)</li> </ul>
<p><b>Owner of a small business<sup>34</sup> primarily located in a qualified census tract(s) or that principally employs and/or principally provides goods or services to residents of a qualified census tract(s).</b></p>	<ul style="list-style-type: none"> <li>Ownership stake must be at least 25%.</li> <li>For customized Investment Areas, the relevant qualified census tract(s) are those within the customized Investment Area geography.</li> <li>Primarily located means at least 51% of the business’ locations.</li> <li>Principally providing goods/ services means at least 51% of the business’ activity is directed in the needed way.</li> </ul>	<ul style="list-style-type: none"> <li>CIMS Map (Applies to first four bullet points)</li> <li>Summary/List of current employees and their full address (Applies to last bullet point)</li> </ul>

<sup>34</sup> For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued in connection the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).

	<ul style="list-style-type: none"> <li>Principally employing means at least 51% of the employees.</li> </ul>	
<p><b>Elected official that primarily represents residents of a qualified census tract(s).</b></p>	<ul style="list-style-type: none"> <li>For customized Investment Areas, the relevant qualified census tract(s) are those within the customized Investment Area geography.</li> <li>Primarily representing means at least 51% of the elected official’s constituents.</li> </ul>	<ul style="list-style-type: none"> <li>CIMS Map (Applies to both bullet points)</li> </ul>
<p><b>Paid direct employee of a non-Affiliated, third-party, community development mission-driven entity that primarily provides services to residents of a qualified census tract(s).</b></p>	<ul style="list-style-type: none"> <li>For customized Investment Areas, the relevant qualified census tract(s) are those within the customized Investment Area geography.</li> <li>“Primarily serving” means at least 51% of the entity’s activity is directed in the needed way.</li> <li>Being community development mission-driven means having a community development mission or purpose.</li> <li>A paid, direct employee means someone who is considered to be an employee for payroll tax purposes. Volunteer or unpaid staff roles are not allowable.</li> </ul>	<ul style="list-style-type: none"> <li>Employer Mission Statement: Is it Community Development driven? Either by                         <ul style="list-style-type: none"> <li>Direct references to serving the Investment Area <u>or</u></li> <li>Explicitly states the organization’s community development purpose.</li> </ul> </li> <li>Place of employment: Does it primarily focus its operations on residents of the qualified census tract within the Investment Area? Either by                         <ul style="list-style-type: none"> <li><b>Provides data</b> that at least 51% of operations is focused on residents of the census tract; or</li> <li><b>Provides information on process</b> used to determine the organization primarily serves residents of the census tract; or</li> <li><b>Describes factors that were taken into consideration</b> to determine the organization primarily serves residents of the census tract; or</li> <li><b>Identifies the service area</b> and how its comprised of qualified Investment Area census tracts.</li> </ul> </li> </ul> <p><b>Note:</b> Both Employer Mission Statement and Place of Employment are applicable to all four bullet points in the “Description” column.</p>

<p><b>Enrollment in a federally recognized tribe.</b></p>	<ul style="list-style-type: none"> <li>• Only for entities that serve at least one customized Investment Area on record for them with the CDFI Fund as part of a formally presented CDFI Certification Target Market or a CDFI Certification collective review market where the customized Investment Area is wholly contained within a Native Community geography.</li> </ul>	<ul style="list-style-type: none"> <li>• Provides the name of a Federally recognized Tribe.</li> </ul>
<p><b>Low-Income Targeted Populations (LITP)</b></p>		
<p><b>Low-Income individual who lives in the United States, its territories, or the District of Columbia.</b></p>	<ul style="list-style-type: none"> <li>• Board member’s Low-Income status must be verified using a CDFI Fund-approved CDFI Certification Target Market Assessment Methodology.</li> </ul>	<ul style="list-style-type: none"> <li>• Verified LITP Board Member</li> </ul>
<p><b>Paid direct employee of a non-Affiliated, third-party, community development mission-driven entity that primarily provides services to Low-Income people in the United States, its territories, or the District of Columbia.</b></p>	<ul style="list-style-type: none"> <li>• “Primarily serving” means at least 51% of the entity’s activity is directed in the needed way.</li> <li>• Being community development mission-driven means having a community development mission or purpose.</li> <li>• A paid, direct employee means someone who is considered to be an employee for payroll tax purposes. Volunteer or unpaid staff roles are not allowable.</li> </ul>	<ul style="list-style-type: none"> <li>• Employer Mission Statement: Is it Community Development driven? Either by                         <ul style="list-style-type: none"> <li>○ Evidences that it serves low income people <u>or</u></li> <li>○ Explicitly states the organization’s community development purpose.</li> </ul> </li> <li>• Place of employment: Does it primarily focus its operations on LITP? Either by                         <ul style="list-style-type: none"> <li>○ <b>Provides data</b> that at least 51% of operations is focused on LITP; or</li> <li>○ <b>Provides information on process</b> used to determine the organization primarily serves LITP; or</li> <li>○ <b>Describes factors that were taken into consideration</b> to determine the organization primarily serves LITP</li> </ul> </li> </ul> <p><b>Note:</b> Both Employer Mission Statement and Place of Employment are applicable</p>

		to all three bullet points in the “Description” column.
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<b>Other Targeted Population (OTP)</b>		
<b>Member of specific Other Targeted Population who lives in the United States, its territories, or the District of Columbia.</b>	<ul style="list-style-type: none"> <li>• Not applicable to OTP – Certified CDFI(s).</li> <li>• Board member’s OTP status must be verified using a CDFI Fund-approved CDFI Certification Target Market Assessment Methodology.</li> </ul>	<ul style="list-style-type: none"> <li>• Self-Report/Visual</li> </ul>
<b>OTP – Certified CDFI(s) only: Paid direct employee of a non-Affiliated Certified CDFI.</b>	<ul style="list-style-type: none"> <li>• A paid, direct employee means someone who is considered to be an employee for payroll tax purposes. Volunteer or unpaid staff roles are not allowable.</li> </ul>	<ul style="list-style-type: none"> <li>• Provides the name of a Certified CDFI</li> </ul>
<b>OTP – Persons with a Disability Only: Family member<sup>35</sup> of a person with a disability, both of whom live in the United States, its territories, or the District of Columbia.</b>	<ul style="list-style-type: none"> <li>• Family member of a person with a disability, both of whom live in the United States, its territories, or the District of Columbia.</li> </ul>	<ul style="list-style-type: none"> <li>• Spouse/Parent/Child/Sibling/Aunt or Uncle</li> </ul>
<b>OTP – Persons with a Disability Only: Paid direct employee of a non-Affiliated, third-party, community development mission-driven entity that primarily provides services to people with disabilities in the United States, its territories, or the District of Columbia.</b>	<ul style="list-style-type: none"> <li>• “Primarily serving” means at least 51% of the entity’s activity is directed in the needed way.</li> <li>• Being community development mission-driven means having a community development mission or purpose.</li> <li>• A paid, direct employee means someone who is considered to be an employee for payroll tax purposes. Volunteer or unpaid staff roles are not allowable.</li> </ul>	<ul style="list-style-type: none"> <li>• Employer Mission Statement: Is it Community Development driven? Either by                             <ul style="list-style-type: none"> <li>○ Direct references to serving Persons with Disabilities or</li> <li>○ Explicitly states the organization’s community development purpose.</li> </ul> </li> <li>• Place of employment: Does it primarily focus its operations on residents of the qualified census tract within the Investment Area? Either by                             <ul style="list-style-type: none"> <li>○ <b>Provides data</b> that at least 51% of operations is focused on Persons with Disabilities; or</li> </ul> </li> </ul>

<sup>35</sup> Family members include those related by blood (including half-siblings), adoption, or marriage.

		<ul style="list-style-type: none"> <li>○ <b>Provides information on process</b> used to determine the organization primarily serves residents of the census tract; or</li> <li>○ <b>Describes factors that were taken into consideration</b> to determine the organization primarily serves Persons with Disabilities.</li> </ul> <p><b>Note:</b> Both Employer Mission Statement and Place of Employment are applicable to all three bullet points in the “Description” column.</p>
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**Accountable Board Member Records**

Board members are identified (or presented) as accountable by setting up an accountable member sub-record in a relevant board member’s board member record.

As the board member records are created, any board member that the Applicant believes is accountable to a component(s) of whatever overall market is relevant to the purpose of the board record (whether it be the Applicant’s CDFI Certification Target Market; or, if applicable, the CDFI Certification collective review market for an entity relevant to the Applicant’s CDFI Certification collective review process; or, if applicable, the Applicants Native American CDFI designation market) should be identified (or presented) as such via the creation of a CDFI Certification accountable board member sub-page in their board member record.

To present a board member as accountable to multiple components of whatever overall market is relevant to the purpose of the applicable board record (i.e., the Applicant’s CDFI Certification Target Market; if applicable, the CDFI Certification collective review market for an entity relevant to the Applicant’s CDFI Certification collective review process; or, if applicable, the Applicants Native American CDFI designation market), a separate CDFI Certification accountable board member sub-page must be created in the board member’s record to link the board member to each such market component.

<b>NOTE</b>	Each Other Targeted Population type is considered to be its own separate Target Market component type and must be presented as Target Market components separately and individually from each other. They cannot be combined together as one overall “Other Targeted Population.”
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After setting up the board record itself, Applicants can either identify board members as accountable as they set up the specific board member records or after they have created a board member records for each board member on the relevant board.

To present a board member as accountable, the accountable member button in the board member’s record will be used. See the information on “To Create a New Organization Board Record in AMIS” in the [CDFI Certification Application AMIS Guide](#) manual.

## **Mapping Requirements**

*Maps are required where noted to confirm board member accountability.*

CIMS provides mapping and geocoding capabilities to support the Application process and to assess the eligibility of board member source of Accountability. Through CIMS, Applicants are able to upload and process the accurate batch geocoding of addresses to confirm addresses and geographies being served.

## **Completing the CDFI Certification Application Accountability Section**

<b>NOTE</b>	<p>Before an Applicant can complete the Accountability section in the CDFI Certification Application for either the general CDFI Certification or the Native American CDFI designation:</p> <p>A board record(s), board member records, and a CDFI Certification accountable member record(s) must be created in the Applicant's AMIS account and, if applicable, in the AMIS accounts for each entity relevant to the Applicant's CDFI Certification collective review process including, if applicable, board, board member, and CDFI Certification accountable member records for certain entities that are not directly relevant to their CDFI Certification review, but are being presented as Controlling entities providing accountability on behalf of another entity(ies) that is.</p>
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**To complete the Accountability section of the CDFI Certification Application, an Applicant must follow all of the applicable steps listed below:**

- Create a related CIMS map(s) in AMIS if any member of the board(s) the Applicant will use as a means of accountability in connection with the general CDFI Certification is being presented as accountable via a source(s) of accountability requiring a CIMS map to demonstrate its validity.
- Create board and board member records in AMIS to present accountability information in connection with the general CDFI Certification for the Applicant;
- Create a CDFI Certification Market record(s) in the CDFI Certification Market section of its AMIS account to represent each component of its CDFI Certification Target Market (note that Targeted Population types are each considered separate Target Market components);
- If applicable, create a CDFI Certification Market record(s) in the CDFI Certification Market section of their AMIS account to represent the Native Community(ies) to which it has accountability;
- Create board, board member, and CDFI Certification accountable member records in their AMIS account to present Accountability information in connection with the general CDFI Certification for themselves;
- If applicable, create board, board member, and CDFI Certification accountable member records in their AMIS account to present their Accountability information in connection with the Native American CDFI designation;
- Review and, if needed, provide or correct any information intended to be auto populated into the CDFI Certification Application Accountability section fields;
- Complete the non-auto populated Accountability section field(s); and

- Attach copies of all required documentation.



### ***Collective Review***

**To complete the Accountability section of the CDFI Certification Application, an Applicant subject to the CDFI Certification collective review process will:**

- As applicable, create or review and, if needed, update its advisory board policy or, if applicable, that of any pertinent entity relevant to its collective review process.
- As applicable, create or review and, if needed, update a board member recusal policy for itself or, if applicable, any pertinent entity relevant to its collective review process.
- If any member of the board(s) each entity relevant to its collective review process will use as a means of accountability in connection with the general CDFI Certification being presented as accountable via a source(s) of accountability requiring a CIMS map to demonstrate its validity, create the related CIMS map(s) in AMIS.
- Create board and board member records in AMIS to present accountability information in connection with the general CDFI Certification for each entity relevant to the applicant's CDFI Certification collective review process.
- If applicable, create a CDFI Certification market record(s) in the CDFI Certification Market section of the AMIS account for each Affiliate or other entity relevant to its CDFI Certification collective review process to represent the CDFI Certification market component(s) that the other entity(ies) will use for the collective review of the Applicant in connection with the Target Market and Accountability tests (note that Targeted Population types are each considered separate CDFI Certification market components).
- Create board, board member, and CDFI Certification accountable member records in their AMIS account to present Accountability information in connection with the general CDFI Certification for each entity relevant to their CDFI Certification collective review process.
- Review and, if needed, provide or correct any information intended to be auto populated into the CDFI Certification Application Accountability section fields.
- Complete the non-auto populated Accountability section field(s).
- Attach copies of all required documentation.



The field labels that display in the board record, board member record, and accountable board member record (vs. the field labels/questions that appear in the pop-up window where the board, board member, and accountable board member data is entered) may not accurately reflect the information that has been or should be provided in that field. Please make sure to hover over the "i" in the black circle for more information on on-screen assistance for how the field should be completed.

**Accountability – General - (AC) Data Fields**

<b>Field</b>	<b>AC01</b>	<b>Field Type</b>	Look-up
<b>Field Label/Question Text</b>	<b>Applicant Accountability</b> – board(s) to demonstrate Applicant’s general CDFI Certification Accountability.		
<b>Response</b>	Select AMIS board record(s)		
<b>Response Instruction(s)</b>			
<p>Use the look-up function in this field to find the board record(s) in the Applicant’s AMIS account for the board(s) that will be used to demonstrate its accountability to its CDFI Certification Target Market and then enter that board(s) as the chosen response by selecting it from the look-up results list.</p> <p>The board record(s) selected must be a new record(s) created specifically for the CDFI Certification Application and must reflect current board information for an as of date no more than 45 days prior to the submission date of the Application. Submission date is determined by the Eastern time submission time stamp on the Application.</p> <p>The number of boards used to demonstrate a particular entity’s accountability in connection with the general CDFI Certification will depend on the method of Accountability used by that entity but will never exceed two boards (one governing board and one advisory board).</p> <p>A board record(s) separate from the board record(s) Applicants are using for the Native American CDFI designation must be created to present Accountability information for the general CDFI Certification, even if the board(s) being used for both purposes is the same.</p> <p>Select two board records within this field if both a governing and an advisory board will be used for CDFI Certification Accountability purposes.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Methods of Accountability</li> </ul>			
<b>Field</b>	<b>AC02</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<b>Collective Review</b> - Is there an Affiliate(s) or other entity(ies) relevant to the Applicant’s CDFI Certification collective review process?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p><b>CLARIFYING UPDATE 07/05/2025]</b></p> <p>Select <b>“Yes” only</b> if the Applicant is a DIHC, an Affiliate of a DIHC, or the Subsidiary of an IDI and therefore subject to the CDFI Certification collective review process and it has a related entity that is relevant to its collective review process.</p>			

If an entity is not subject to the CDFI Certification collective review process, it is only required to demonstrate its own accountability to its CDFI Certification Target Market, not that of any Affiliate or other related entity.

**Review the following information before completing this field:**

- CDFI Certification collective review requirements

### 5.9.2. Accountability – Collective Review

This subsection will appear **only if** the response is “No” in **BI10**. This subsection allows you to input information into dynamic tables (see subsection for a detailed explanation on navigating these tables). The Applicant will identify up to two board(s) to maintain accountability to the proposed Target Market. The boards will be selected from the Applicant’s Organization Detail page.



#### ***Collective Review***

**For a DIHC, an Affiliate of a DIHC, or a Subsidiary of an IDI to be certified as a CDFI, it must demonstrate accountability both:**

- **Individually** to its own CDFI Certification Target Market, based on its own Accountability method; ***and***
- **Collectively**, where each entity relevant to its CDFI Certification collective review process must also demonstrate its accountability to either the primary entity under review’s CDFI Certification Target Market or to a Target Market component(s) that has been formally identified for its own use specifically in connection with the primary entity’s collective review process via its own Accountability method, or, as an option if the entity relevant to the collective review does not engage in its own eligible Financial Products or eligible Financial Services activity, via the accountability of an entity that Controls it, even if it has not adopted the board(s) used as a means of Accountability by the Controlling entity as its own board(s).
  - If a Controlling entity will be used to provide accountability for an entity(ies) relevant to a CDFI Certification collective review process, a governing leadership-approved document evidencing the applicable Control relationship must be available.
  - A single Controlling entity can provide accountability for as many entities relevant to a CDFI Certification collective review process as meet the conditions to use that provision.
  - If the needed Control relationship exists, the Applicant is allowed to be used as a Controlling entity that provides accountability to entities relevant to its CDFI Certification review that do not engage in any eligible Financial Products or eligible Financial Services activity.

**Accountability – Board Records – (AC-GA) Data Fields**

This subsection will appear **only if** the response is “No” in **BI10**. This subsection allows you to input information into dynamic tables (see subsection for a detailed explanation on navigating these tables). The Applicant will identify up to two board(s) to maintain accountability to the proposed Target Market. The boards will be selected from the Applicant’s Organization Detail page.

<b>Field</b>	<b>AC03</b>	<b>Field Type</b>	Look-up
<b>Field Label/Question Text</b>	<p>If an Affiliate(s) or other entity(ies) is relevant to the Applicant’s CDFI Certification collective review process:  <b>Collective Review</b> - entity relevant to collective review process.</p>		
<b>Response</b>	Select entity name		
<b>Response Instruction(s)</b>			
<p>Use the look-up function in this field to find the entity(ies) relevant to the Applicant’s CDFI Certification collective review process and then enter that entity name as the chosen response by selecting it from the look-up results list.</p> <p>The entity(ies) identified should be those that are directly relevant to the Applicant’s CDFI Certification collective review process. Entities that are not directly relevant to the Applicant’s CDFI Certification review but, as allowed by the CDFI Fund, are being used as a Controlling entity providing accountability to another entity(ies), do not need to be identified here.</p>			
<b>Field</b>	<b>AC03.1</b>	<b>Field Type</b>	Look-up
<b>Field Label/Question Text</b>	<p>If an Affiliate(s) or other entity(ies) is relevant to the Applicant’s CDFI Certification collective review process:  <b>Collective Review</b> - board(s) to demonstrate Accountability for entity relevant to collective review process</p>		
<b>Response</b>	Select AMIS board record(s)		
<b>Response Instruction(s)</b>			
<p>Use the look-up function in this field to find the board record(s) in the AMIS account for the entity relevant to the Applicant’s CDFI Certification collective review process that represents the board(s) that will be used to demonstrate its accountability to the CDFI Certification collective review market chosen for it in connection with the primary entity under review’s CDFI Certification process and then enter that board(s) as the chosen response by selecting it from the look-up results list.</p> <p>The board record(s) selected must be a new record(s) created specifically for the CDFI Certification Application and must reflect current board information for an as of date no more than 45 days prior to the submission date of the Application. Submission date is determined by the Eastern time submission time stamp on the Application.</p>			

The number of boards used to demonstrate accountability for an entity relevant to the Applicant's CDFI Certification collective review process will depend on the method of Accountability being used by the relevant related entity but will never exceed two boards (one governing board and one advisory board).

The board record(s) identified here should be the one(s) created in the AMIS account of the entity(ies) that are directly relevant to the Applicant's CDFI Certification collective review process. If an entity that is directly relevant to the Applicant's CDFI Certification collective review process is allowed to use a Controlling entity to demonstrate its accountability in connection with the Applicant's CDFI Certification process and elects to do so, the board record(s) created under the name of the Controlling entity does not need to be identified here. The board record(s) under the name of the entity using the Controlling entity's Accountability status that will be linked here will provide the needed linkage to the relevant board information in the Controlling entity's AMIS account. If an entity being used as a Controlling entity to provide accountability for another entity is itself also directly relevant to the Applicant's CDFI Certification collective review process, in addition to the board record(s) in the Controlling entity's AMIS account that pertains to that other entity's accountability, there will be , a separate board record(s) in the Controlling entity's AMIS account that pertains to its own accountability in connection with the Applicant's CDFI Certification collective review process, which will be linked to the Application under the Controlling entity's own name.

Each entity relevant to the Applicant's CDFI Certification collective review process must be able to demonstrate its accountability based solely on the CDFI Certification collective review market selected for its use for that particular collective review. The market may have been selected by the entity's governing and/or formal advisory board or, if it does not engage in its own financial product activity, via the accountability to the selected CDFI Certification collective review market of an entity that Controls it. This applies even if the entity has not adopted the relevant board(s) used by the Controlling entity as its own board(s) and even if that Controlling entity is not itself relevant to the that applicable collective review.

The CDFI Certification collective review market for an entity relevant to another entity's collective review process can be either the allowed CDFI Certification Target Market for the primary entity under review or a Target Market component(s) that has been formally identified for the entity relevant to the collective review's own use in connection with the applicable primary entity's collective review process. Whichever market is selected for an entity relevant to the collective review in connection with a particular primary entity's review process must be used solely and consistently by the relevant related entity for that particular primary entity's collective review process for the Target Market (if applicable because relevant eligible financing is engaged in) and Accountability tests.

For an entity relevant to the Applicant's CDFI Certification collective review process using the accountability of a Controlling entity to demonstrate accountability in connection with the other entity's CDFI Certification, the board records for both the entity relevant to the collective review process and for the Controlling entity (even if the Controlling entity is not itself relevant to the Applicant's collective review process) should all be linked under the name of the entity using the Controlling entity's accountability. If the Controlling entity is also relevant to the Applicant's collective review process, the board record(s) it is using for its own accountability will be linked separately under its own entity name.

Select two board records within this field if the entity relevant to the Applicant’s CDFI Certification collective review will use both a governing and an advisory board will be used for CDFI Certification Accountability purposes.

**Repeat AC03 through AC03.1 for all entities relevant to the Applicant’s CDFI Certification collective review process.**

### 5.9.3. Accountability – Board and Board Member Records

#### Accountability – Board Records – (AC-GA) Data Fields

*The following fields will be completed in the board record created in the Organization Boards section of an entity’s AMIS account.*

Field	AMIS	Field Type	Picklist
Field Label/Question Text	Board record purpose		
Response	Select one: <ul style="list-style-type: none"> <li>• CDE Certification.</li> <li>• CDFI Certification – own certification.</li> <li>• Native American CDFI designation.</li> <li>• CDFI Certification – collective review for another entity – Accountability self-provided.</li> <li>• CDFI Certification – collective review for another entity – Accountability provided by Controlling entity – record for entity using Controlling entity.</li> <li>• CDFI Certification – collective review for another entity – Accountability</li> <li>• Provided by Controlling entity – Controlling entity’s record.</li> </ul>		
Response Instruction(s)	Indicate the reason the board record has been created. That is, what Accountability information does the board record provide (e.g., Accountability information for the Applicant in connection with its general CDFI Certification, accountability for an entity relevant to another entity’s CDFI Certification collective review process in connection with that other entity’s CDFI Certification, etc.). A board record is created in the AMIS account of the entity whose board information is being presented. If the Applicant’s board information is being presented, the board record will be created in the Applicant’s AMIS account. If the board information is for an entity relevant to another entity’s CDFI Certification collective review, the board record will be created in the collective review-relevant entity’s AMIS account.		

If an entity relevant to another entity’s collective review process (1) does not engage in any eligible Financial Products and/or eligible Financial Services activity and (2) it has elected to use a Controlling entity’s board information to demonstrate its accountability in connection with the other entity’s collective review, then a board record will be created in the collective review-relevant entity’s AMIS to report that the Controlling entity will be used. The actual board information will be presented via a board record(s) in the Controlling entity’s AMIS account.

The “CDFI Certification – Collective Review for another entity – Accountability provided by Controlling entity – record for entity using Controlling entity” response option should only be selected if the board record is for an entity that: (1) is demonstrating its accountability in connection with the CDFI Certification collective review process for another entity’s CDFI Certification; (2) does not engage in any eligible Financial Products or eligible Financial Services activity; and (3) has a documented Controlling entity that can demonstrate the needed accountability to the primary entity under review’s CDFI Certification Target Market or to an allowable market selected for the entity for which it is providing accountability.

The “CDFI Certification – Collective Review for another entity – Accountability provided by Controlling entity – Controlling entity’s record” response option should only be selected if the board record is for an entity that is eligible to provide accountability as a Controlling entity for an entity relevant to a CDFI Certification collective review process in connection with the CDFI Certification CDFI Certification collective review process.

If an entity relevant to another entity’s CDFI Certification Collective Review process does not engage in any eligible Financial Products and/or eligible Financial Services activity and seeks to use the accountability of a Controlling entity to meet the Accountability requirements in connection with the other entity’s collective review process, a board record must be created in its AMIS account to indicate that and a board record(s) must be created in the Controlling entity’s account to present the Controlling entity’s board information.

If “CDE Certification” is selected and associated with a CDFI Certification Application, the board record will not be reviewed and the Applicant will be deemed not accountable for the CDFI Certification.

Field	AMIS	Field Type	Auto populated or look-up.
<b>Field Label/Question Text</b>	Program Profile		
<b>Response</b>	If not auto populated, select Program Profile from drop-down list of active Program Profile numbers.		

**Response Instruction(s)**

If this field appears in the board record it will either be auto populated or the Applicant will use a look-up process to find and select the needed information.

Field	AMIS	Field Type	Auto populated or look-up
<b>Field Label/Question Text</b>	CDFI Certification form ID		

<b>Response</b>	If not auto populated, select form ID for the CDFI Certification form in connection with which the board is being presented from drop-down list of active form ID numbers.		
<b>Response Instruction(s)</b>			
If this field appears in the board record it will either be auto populated or the Applicant will use a look-up process to find and select the needed information.			
<b>Field</b>	<b>AMIS</b>	<b>Field Type</b>	<b>Auto populated</b>
<b>Field Label/Question Text</b>	CDFI Certification control number		
<b>Response</b>	Auto populated from the CDFI Certification Application		
<b>Response Instruction(s)</b>			
The auto populated response reflects the CDFI Certification control number assigned to the Application. The CDFI Certification control number will not show until the board record has been linked to the CDFI Certification Application.			
<b>Field</b>	<b>AMIS</b>	<b>Field Type</b>	<b>Look-up</b>
<b>Field Label/Question Text</b>	<p><u>If purpose of board record is “CDFI Certification – Collective Review for another entity – Accountability self-provided” or “CDFI Certification – Collective Review for another entity – Accountability provided by Controlling entity – record for entity using Controlling entity” or “CDFI Certification – Collective Review for another entity –Accountability provided by Controlling entity – Controlling entity’s record”:</u>  <b>Collective Review</b> – primary entity subject to collective review.</p>		
<b>Response</b>	Select entity name		
<b>Response Instruction(s)</b>			
Use the look-up function in this field to find the Applicant’s name (the Applicant is the primary entity under review whose CDFI Certification collective review the entity presenting its Accountability information is relevant to) and then enter that name as the chosen response by selecting it from the look-up results list. This field will only appear if the purpose of the board record is for an entity to demonstrate accountability in connection with another entity’s CDFI Certification because it is relevant to that other’s entity’s CDFI Certification collective review process.			

Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p>If purpose of board record is “CDFI Certification – Collective Review for another entity –Accountability provided by Controlling entity – record for entity using Controlling entity”:</p> <p><b>Collective Review</b> – Does the entity presenting its Accountability information for another entity’s CDFI Certification collective review process engage in the direct provision of Financial Products or Financial Services?</p>		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p>Indicate whether the entity whose Accountability information is being provided engages in any eligible Financial Products and/or eligible Financial Services activity.</p> <p>This field will only appear if the Applicant’s selected purpose of the board record is to demonstrate accountability for an entity relevant to another entity’s CDFI collective review process that does not engage in any eligible Financial Products and/or eligible Financial Services activity and that seeks to have its accountability provided by a Controlling entity .</p> <p>By the direct provision of Financial Products or Financial Services, the CDFI Fund means engaging in eligible Financial Products and/or eligible Financial Services activity.</p> <p>If “Yes,” the entity relevant to another entity’s CDFI Certification collective review process cannot elect to have its accountability in connection with that other entity’s CDFI Certification be provided by a Controlling entity.</p>			
Field	AC03.1a	Field Type	Look-up
Field Label/Question Text	<p>If purpose of board record is “CDFI Certification – Collective Review for another entity –Accountability provided by Controlling entity – record for entity using Controlling entity” <b>and</b> the entity presenting its Accountability information because it is relevant to another entity’s CDFI Certification Collective Review process does not engage in the direct provision of Financial Products or Financial Services:</p> <p><b>Collective Review</b> – Controlling entity providing the Accountability</p>		
Response	Select entity name		
<b>Response Instruction(s)</b>			
<p>Use the look-up function in this field to find the Controlling entity that will be used by the entity whose Accountability information is being provided to demonstrate its accountability in connection with the Applicant’s CDFI Certification and then enter the Controlling entity’s name as the chosen response by selecting it from the look-up results list.</p>			

If a Controlling entity will be used to provide accountability for an entity(ies) relevant to a CDFI Certification collective review process, the Applicant must provide a governing leadership-approved document evidencing the applicable Control relationship.

A single Controlling entity can provide accountability for as many entities relevant to a CDFI Certification collective review process as meet the conditions to use that provision.

If the needed Control relationship exists, the Applicant can be used as a Controlling entity that provides accountability to entities relevant to its CDFI Certification review that do not engage in any eligible Financial Products and/or eligible Financial Services activity.

This field will only appear if the selected purpose of the board record is to demonstrate accountability for an entity relevant to another entity’s CDFI collective review process that does not engage in any eligible Financial Products or eligible Financial Services activity and that seeks to have its accountability in connection with that other entity’s CDFI Certification be provided by a Controlling entity.

Field	AMIS	Field Type	Attachment
Field Label/Question Text	<p><u>If purpose of board record is CDFI “Certification – Collective Review for another entity –Accountability provided by Controlling entity – record for entity using Controlling entity” <b>and</b> the entity presenting its Accountability information because it is relevant to another entity’s CDFI Certification Collective Review process does not engage in the direct provision of Financial Products or Financial Services:</u>  <b>Collective Review</b> – document that demonstrates the entity providing Accountability is a Controlling Entity</p>		
Response	Attachment required document(s)		

**Response Instruction(s)**

Attach a governing leadership-approved document that verifies the Control relationship between the entity whose Accountability information is being provided and the entity whose accountability it seeks to use in connection with Applicant’s CDFI Certification collective review process.

**NOTE:** Examples of documents that evidence a Control relationship between entities include a stock summary report showing that the Controlling entity owns at least 25% of the other entity’s voting shares; a memorandum of understanding between the two entities that addresses the Control relationship; a copy of the Subsidiary’s governance document stating that the Controlling entity appoints a majority of the Subsidiary’s governing board or that indicates of forms of Control; etc. The document must evidence governing leadership approval in a way accepted by the CDFI Fund for CDFI Certification purposes (for information on evidence of governing leadership approval accepted for CDFI Certification purposes, see the [Evidence That a Document Is Governing Leadership-Approved](#) in the CDFI Certification – Documentation Requirements section of this guidance manual).

<p>This field will only appear if the selected purpose of the board record is that an entity relevant to another entity’s CDFI collective review process seeks to have its accountability in connection with that other entity’s CDFI Certification be provided by a Controlling entity.</p> <p>The effective date of the relationship must be as of or prior to the submission date of the CDFI Certification Application.</p>			
Field	AMIS	Field Type	Look-up
Field Label/Question Text	<p><u>If purpose of board record is “CDFI Certification – Collective Review for another entity –Accountability provided by Controlling entity – record for entity using Controlling entity” <b>and</b> the entity presenting its Accountability information because it is relevant to another entity’s CDFI Certification Collective Review process does not engage in the direct provision of Financial Products or Financial Services:</u></p> <p><b>Collective Review</b> – Controlling entity’s board(s) that demonstrates the needed Accountability.</p>		
Response	Select AMIS board record(s)		
Response Instruction(s)			
<p>Use the look-up function in this field to find the board record(s) for the Controlling entity providing accountability and then enter that board(s) as the chosen response by selecting it from the look-up results list.</p> <p>To link to a board record in the Controlling entity’s AMIS account, the entity relevant to the collective review process will need to set up reciprocal contacts in its AMIS account and in the Controlling entity’s AMIS account. For assistance with this process, submit an AMIS Service Request.</p> <p>This field will only appear if the selected purpose of the board record is that an entity relevant to another entity’s CDFI collective review process seeks to have its accountability in connection with that other entity’s CDFI Certification be provided by a Controlling entity.</p>			
<p><i>Entities relevant to another entity’s CDFI Certification Collective Review that are using a Controlling entity to demonstrate their accountability in connection with that particular Collective Review do not need to provide any further information on their own board(s).</i></p> <p><i>All other Accountability information for such entities must be presented via the AMIS account for the relevant Controlling entity.</i></p>			
Field	AMIS	Field Type	Look-up
Field Label/Question Text	<p><u>If the purpose of board record is “CDFI Certification – Collective Review for another entity – Accountability provided by Controlling entity – Controlling entity’s record”:</u></p> <p><b>Collective Review</b> – entity(ies) using Controlling entity’s Accountability</p>		

<b>Response</b>	Select entity name		
<b>Response Instruction(s)</b>			
Use the look-up function in this field to find the entity relevant to Applicant’s collective review process that does not engage in any eligible Financial Products and/or eligible Financial Services activity and that seeks to use the accountability of the entity whose board information is being presented (as its Controlling entity) to demonstrate its accountability in connection with the Applicant’s CDFI Certification collective review process and then enter that entity’s name as the chosen response by selecting it from the look-up results list.			
<b>Field</b>	<b>AMIS</b>	<b>Field Type</b>	<b>Look-up</b>
<b>Field Label/Question Text</b>	<p>If the purpose of board record is CDFI Certification – Collective Review for another entity –Accountability provided by Controlling entity – Controlling entity’s record:  <b>Collective Review</b> – related board record(s) for entity(ies) using Controlling entity’s Accountability</p>		
<b>Response</b>	Select AMIS board record(s)		
<b>Response Instruction(s)</b>			
Use the look-up function in this field to find the board record for the entity relevant to Applicant’s collective review process that does not engage in any eligible Financial Products and/or eligible Financial Services activity and that seeks to use the accountability of the entity whose board information is being presented (as its Controlling entity) to demonstrate its accountability in connection with the Applicant’s CDFI Certification and then enter that board record name as the chosen response by selecting it from the look-up results list.			
While the field label/question and/or other text prompts for this field indicate that multiple entities using the Controlling entity’s accountability can be listed in a single board record in the Controlling entity’s AMIS account, a separate board record must be created in the Controlling entity’s AMIS account for each individual entity. The entities involved may have different CDFI Certification collective review markets and the accountability needed by them from the Controlling entity might, therefore, be different.			
<p><i>If the purpose of board record is CDFI Certification – own CDFI Certification <b>or</b> CDFI Certification – Collective Review for another entity – Accountability self-provided <b>or</b> CDFI Certification – Collective Review for another entity – Accountability provided by Controlling entity – Controlling entity’s record <b>or</b> Native American CDFI:</i></p>			
<b>Field</b>	<b>AMIS</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Method of Accountability		

<b>Response</b>	Select one: <ul style="list-style-type: none"> <li>• Governing board only</li> <li>• Governing board and advisory board</li> <li>• Advisory board and credit union membership Target Market level (for general CDFI Certification; credit union only)</li> <li>• Advisory board only (DIHC[s], IDI[s], and those with no formal governing board only)</li> <li>• Advisory board and credit union membership Native Community(ies) level (for Native American CDFI designation; for credit unions only)</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response to identify what method of Accountability the entity whose Accountability information is being presented will use.  For CDFI Certification purposes, a governing board is any board that is integrated as a part of an entity’s organizational structure and that functions as its governing leadership. If a board that is referred to by an entity as something other than a governing board (e.g., it may be referred to as an advisory board, managing board, etc.) is integrated as a part of the entity’s organizational structure and has the authority to act as its governing leadership, then regardless of how the entity refers to it, that board is the entity’s governing board for CDFI Certification purposes. Information on an entity’s governance structure and what body, entity(ies) or individual(s) functions as its governing leadership is typically found in its governance document, i.e., its bylaws, operating agreement or similar.  If using the governing board and advisory board method of Accountability, separate board records must be created for each of the relevant boards. The method of Accountability in both such records must reflect the governing board and advisory board response option.			
<b>Field</b>	<b>AMIS</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Board type		
<b>Response</b>	Select one: <ul style="list-style-type: none"> <li>• Governing board</li> <li>• Advisory board</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response to identify the type of board being presented as a means of Accountability.  For CDFI Certification purposes, a governing board is any board that is integrated as a part of an entity’s organizational structure and that functions as its governing leadership. If a board that is referred to by an entity as something other than a governing board (e.g., it may be referred to as an advisory board, managing board, etc.) is integrated as a part of the entity’s organizational structure and has the authority to act as its governing leadership, then regardless of how the entity refers to it, that board is the entity’s governing board for CDFI Certification purposes. Information on an entity’s			

governance structure and what body, entity(ies) or individual(s) functions as its governing leadership is typically found in its governance document (i.e., its bylaws, operating agreement or similar document).			
Field	AMIS	Field Type	Text
Field Label/Question Text	Board record name		
Response	Text		
Response Instruction(s)			
Enter a name for the board record.			
Field	AMIS	Field Type	Numeric
Field Label/Question Text	Total number of board members (including board members that are also paid direct employees for the entity served by the board)		
Response	Enter number		
Response Instruction(s)			
<p>Enter the number of members that are on the board being presented as a means of Accountability as of a date no more than 45 days prior to the date when the CDFI Certification Application is submitted. Submission date is determined by the Eastern time submission time stamp on the Application. Do not include unfilled or vacant board seats in the count. Only indicate the number people actually on the board, including any staff members of the entity the board serves.</p> <p>For governing boards, if the overall number of active board members (i.e., filled board seats) is not at least three, then the relevant governing board cannot be used as a means of CDFI Certification Accountability.</p> <p>For advisory boards, if the overall number of active board members (i.e., filled board seats) is not at least five, then the relevant advisory board cannot be used as a means of CDFI Certification Accountability.</p>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p><u>If the type of board is advisory board:</u>  <b>Advisory board governing leadership representation</b> – Is at least one member of the governing leadership for the entity served by the advisory board also one of the advisory board’s standing members?</p>		
Response	Yes or No		

Response Instruction(s)			
<p>If the board being presented is an advisory board, select the appropriate response to identify whether at least one member of the advisory board is also a member of the governing leadership for the entity the board serves.</p> <p><b>If “No,”</b> the entity whose Accountability information is being provided cannot use the relevant advisory board for CDFI Certification Accountability purposes.</p> <p>The response should address whatever entity’s Accountability information is being presented rather than the Applicant’s status with regard to the standard/requirement as the field label/question indicates. For example, if the board record is for the Applicant, then it is the Applicant’s status that matters. If the board record is for an entity relevant to the Applicant’s collective review, then it is the entity relevant to the collective review about which the response should be given. If the board record is for a Controlling entity providing accountability to another entity, then the response should be about that Controlling entity.</p>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p>If the type of board is advisory board:  <b>Advisory board policy</b> – Does the Applicant have an-advisory board policy that has been approved by its governing leadership?</p>		
Response	Yes or No		
Response Instruction(s)			
<p>Select the appropriate response to identify whether the entity whose Accountability information is being presented has a governing leadership-approved advisory board policy that covers the advisory board being presented as means of accountability.</p> <p><b>If “No,”</b> the entity whose Accountability information is being provided cannot use the relevant advisory board for CDFI Certification Accountability purposes.</p> <p>If the advisory board documentation does not show that the advisory board policy is binding via clear evidence (in one of the ways allowed by the CDFI Fund) of its approval by the Applicant’s governing leadership and of its approval date, the policy will not be considered valid. For information on evidence of governing leadership approval that is accepted for CDFI Certification purposes, see <a href="#">“Evidence that a Document is Governing Leadership-Approved”</a> in the CDFI Certification – Documentation Requirements section of this guidance manual.</p> <p>The response should address whatever entity’s Accountability information is being presented, rather than the Applicant’s status with regard to the relevant standard/requirement as the field label/question indicates. For example, if the board record is for the Applicant, then it is the Applicant’s status that matters. If the board record is for an entity relevant to the Applicant’s collective review, then it is the entity relevant to the collective review about which the response should be given. If the board record is for a Controlling entity providing accountability to another entity, then the response should be about that Controlling entity.</p>			

Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p>If there is an advisory board policy:  <b>Advisory board policy</b> – Does the policy describe the role of the advisory board?</p>		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to identify whether the advisory board policy that covers the advisory board being presented as a means of Accountability clearly indicates that role of that advisory board includes that of providing input to the governing leadership on strategic and policy matters.</p> <p><b>If “No,”</b> the entity whose Accountability information is being provided cannot use the relevant advisory board for CDFI Certification Accountability purposes.</p> <p>The response should address whatever entity’s Accountability information is being presented, rather than the Applicant’s status with regard to the relevant standard/requirement as the field label/question indicates. For example, if the board record is for the Applicant, then it is the Applicant’s status that matters. If the board record is for an entity relevant to the Applicant’s collective review, then it is the entity relevant to the collective review about which the response should be given. If the board record is for a Controlling entity providing accountability to another entity, then the response should be about that Controlling entity.</p>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p>If there is an advisory board policy:  <b>Advisory board policy</b> – Does the policy require that the advisory board be made up of at least five members that are appointed through a duly documented action of the governing leadership?</p>		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p>The response should address whatever entity’s Accountability information is being presented, rather than the Applicant’s status with regard to the relevant standard/requirement as the field label/question indicates. For example, if the board record is for the Applicant, then it is the Applicant’s status that matters. If the board record is for an entity relevant to the Applicant’s collective review, then it is the entity relevant to the collective review about which the response should be given. If the board record is for a Controlling entity providing accountability to another entity, then the response should be about that Controlling entity.</p>			

Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p><u>If there is an advisory board policy:</u>  <b>Advisory board policy</b> – Does the policy describe how the input that the advisory board provides to the governing leadership is documented?</p>		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to identify whether the advisory board policy that covers the advisory board being presented as a means of Accountability clearly indicates a formal mechanism(s) by which the relevant advisory board’s input is conveyed to the governing leadership.</p> <p><b>If “No,”</b> the entity whose Accountability information is being provided cannot use the relevant advisory board for CDFI Certification Accountability purposes.</p> <p>The response should address whatever entity’s Accountability information is being presented, rather than the Applicant’s status with regard to the relevant standard/requirement as the field label/question indicates. For example, if the board record is for the Applicant, then it is the Applicant’s status that matters. If the board record is for an entity relevant to the Applicant’s collective review, then it is the entity relevant to the collective review about which the response should be given. If the board record is for a Controlling entity providing accountability to another entity, then the response should be about that Controlling entity.</p>			
Field	AC-GA03.2d	Field Type	Picklist
Field Label/Question Text	<p><u>If there is an advisory board policy:</u>  <b>Advisory board policy</b> – Does the policy describe how the advisory board seeks input from, and/or reviews data on the financial needs and opportunities in the Target Market and/or, if applicable, the Native Community(ies) for which it provides Accountability?</p>		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to identify whether the advisory board policy that covers the advisory board being presented as a means of Accountability clearly indicates a meaningful process by which the advisory board seeks input from, and/or reviews data on the financial needs and opportunities in, the CDFI Certification Target Market, CDFI Certification collective review market, or Native Community market for which it provides accountability.</p> <p><b>If “No,”</b> the entity whose Accountability information is being provided cannot use the relevant advisory board for CDFI Certification Accountability purposes.</p>			

<p>The response should address whatever entity’s Accountability information is being presented, rather than the Applicant’s status with regard to the relevant standard/requirement as the field label/question indicates. For example, if the board record is for the Applicant, then it is the Applicant’s status that matters. If the board record is for an entity relevant to the Applicant’s collective review, then it is the entity relevant to the collective review about which the response should be given. If the board record is for a Controlling entity providing accountability to another entity, then the response should be about that Controlling entity.</p>			
<b>Field</b>	<b>AC-GA03.2e</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p>If there is an advisory board policy:  <b>Advisory board policy</b> – Does the policy state the advisory board meets at least three times a year?</p>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to identify whether the advisory board policy that covers the advisory board being presented as a means of Accountability clearly indicates that the relevant advisory board meets at least three times per year.</p> <p><b>If “No,”</b> the entity whose Accountability information is being provided cannot use the relevant advisory board for CDFI Certification Accountability purposes.</p> <p>The response should address whatever entity’s Accountability information is being presented, rather than the Applicant’s status with regard to the relevant standard/requirement as the field label/question indicates. For example, if the board record is for the Applicant, then it is the Applicant’s status that matters. If the board record is for an entity relevant to the Applicant’s collective review, then it is the entity relevant to the collective review about which the response should be given. If the board record is for a Controlling entity providing accountability to another entity, then the response should be about that Controlling entity.</p>			
<p><b>NOTE:</b> An acceptable advisory board policy for the advisory board being presented as a means of Accountability must also require that the advisory board members be appointed by the governing leadership.</p>			
<b>Field</b>	<b>AMIS</b>	<b>Field Type</b>	Attachment
<b>Field Label/Question Text</b>	<p>If there is an advisory board policy:  <b>Advisory board policy</b> – governing leadership approved advisory board policy</p>		
<b>Response</b>	Attach required document(s)		

Response Instruction(s)			
<p>Attach a copy of the current binding advisory board policy that covers the advisory board being presented as a means of Accountability with unmistakable evidence (in one of the ways accepted by the CDFI Fund) of its Approval by the governing leadership of the entity the advisory board serves and of its approval date.</p> <p>If the documentation provided does not show that the relevant document is binding via unmistakable evidence (as allowed by the CDFI Fund) of its approval by the relevant governing leadership and of its approval date, the document will not be considered valid. For information on evidence of governing leadership approval that is accepted for CDFI Certification purposes, see <a href="#">“Evidence that a Document is Governing Leadership-Approved”</a> in the CDFI Certification – Documentation Requirements section of this guidance manual.</p> <div style="border: 1px solid black; padding: 5px; background-color: #fff9c4;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div> <p>The name of the entity the advisory board serves must show clearly in the advisory policy document and must match its current entity name as it appears in its AMIS account or documentation filed with an appropriate government or tribal government agency responsible for the registration or oversight of entities operating within a certain jurisdiction or industry linking the entity name in the governance document to the current entity name in AMIS must be provided.</p> <p>The advisory board policy does not need to have been in effect for any specific length of time, but the effective date of the current advisory board policy must be as of or prior to the date of submission of the CDFI Certification Application.</p>			
<p><i>If board type is Advisory board <b>and</b> method of Accountability is Advisory board and credit union membership Target Market level (for general CDFI Certification; credit union only):</i>  <b>If “Yes” to AC-GA02</b></p>			
Field	AMIS	Field Type	Numeric
Field Label/Question Text	<p><u>If board type is advisory board <b>and</b> method of Accountability is Advisory board and credit union membership Target Market level (for general CDFI Certification; credit union only):</u></p> <p>Advisory board and credit union membership Target Market level method of Accountability – total number of credit union members active with the Applicant as of the end of the most recently completed fiscal year</p>		
Response	Enter number		

Response Instruction(s)			
<p>Enter the total number of credit union members active with the entity served by the advisory board as of the last day of that entity’s most recently completed fiscal year.</p> <p>The response should address whatever entity’s Accountability information is being presented, rather than the Applicant’s status with regard to the relevant standard/requirement as the field label/question indicates. For example, if the board record is for the Applicant, then it is the Applicant’s status that matters. If the board record is for an entity relevant to the Applicant’s collective review, then it is the entity relevant to the collective review about which the response should be given. If the board record is for a Controlling entity providing accountability to another entity, then the response should be about that Controlling entity.</p>			
Field	AMIS	Field Type	Picklist and numeric
Field Label/Question Text	<p><u>If board type is advisory board <b>and</b> method of Accountability is Advisory board and credit union membership Target Market level (for general CDFI Certification; for credit unions only):</u> Advisory board and credit union membership Target Market level method of Accountability – number of credit union members that are part of the Target Market</p>		
Response	<p>Identify CDFI Certification Target Market or CDFI Certification collective review market type(s) relevant to the purpose of the board record and enter the unduplicated number of credit union members part of the identified market type(s) counting a credit union member as part of only one of the Target Market types for which they might qualify.</p>		
Response Instruction(s)			
<p>Identify the CDFI Certification Target Market, CDFI Certification collective review market or Native American CDFI Native Communities market Type(s) relevant to the purpose of the board record and enter the unduplicated/non-overlap number of credit union members classified as being part of the applicable market type(s) with no overlap between market types (i.e., counting a credit union member as part of only one of the market types for which they might qualify).</p> <p>The response should address whatever overall market is relevant to the purpose of the board record, rather than only address CDFI Certification Target Market information as the field label/question and/or other text prompts for this field may indicate. The overall market may be the Applicant’s CDFI Certification Target Market or, if applicable, the CDFI Certification collective review market for an entity relevant to the Applicant’s CDFI Certification collective review process or, if applicable, a Native Community(ies) if the Applicant seeks the Native American CDFI designation.</p> <p>If the Accountability information being presented is for:</p> <ul style="list-style-type: none"> <li>- General CDFI Certification, then enter the number of the credit union members active with the Applicant as of the last day of its most recently</li> </ul>			

- completed fiscal year that are part of each market type in its CDFI Certification Target Market.
- Native American CDFI designation, then enter the number of the credit union members active with the Applicant as of the last day of its most recently completed fiscal year that are part of each market type in its Native American CDFI designation market.
  - An entity relevant to the CDFI Certification Applicant’s collective review process, then enter the number of credit union members active with the entity whose information is being presented as of the last day of its most recently completed fiscal year that are part of each market type in its chosen CDFI Certification collective review market.
  - A Controlling entity being used for Accountability purposes by an entity relevant to the Applicant’s collective review process that does not engage in any eligible Financial Products and/or eligible Financial Services activity, then enter the number of credit union member’s active with the Controlling entity as of the last day of its most recently completed fiscal year that are part of each market type in the chosen CDFI Certification collective review market for the entity that is using the Controlling entity.

To determine the number of credit union members that are part of each relevant market type, a CDFI Fund-approved CDFI Certification Target Market Assessment Methodology(ies) must be used (see [Pre-Approved CDFI Certification Target Market Assessment Methodologies](#)).

The credit union member market levels and eligible Financial Products activity market level are not allowed to be determined via an estimation process. Instead, market levels must be verified based on a direct assessment of the credit union member data itself. If this is not possible, contact the CDFI Fund via an AMIS Service Request for assistance.

Check that at least 33% (with no rounding up allowed) of the credit union members are part of the relevant overall market relevant to the purpose of the board records.

If, as applicable based on the purpose of the board record, the overall credit union member CDFI Certification Target Market, CDFI Certification collective review market or Native American CDFI designation market type(s) level is less than 33% (no rounding of the percentage allowed) using all relevant market types, the advisory board with credit union member method of Accountability cannot be used.

Field	AMIS	Field Type	Auto calculated
Field Label/Question Text	<p><u>If board type is advisory board <b>and</b> method of Accountability is Advisory board and credit union membership Target Market level (for credit unions only):</u></p> <p>Advisory board and credit union membership Target Market level method of Accountability for general CDFI Certification – percentage of credit union members that are part of the Target Market</p>		
Response	Auto calculated		

Response Instruction(s)			
If visible in the CDFI Certification Application form in AMIS, this field will be auto calculated.			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p>If board type is advisory board <b>and</b> method of Accountability is <u>Advisory board and credit union membership Target Market level (for general CDFI Certification; for credit unions only):</u>                      Advisory board and credit union membership Target Market level method of Accountability – Applicant attests that only a CDFI Fund-approved Target Market assessment methodology(ies) has been and will continue to be used to determine whether credit union members are of an eligible Target Market type(s).</p>		
Response	Yes or No		
Response Instruction(s)			
<p>Select the appropriate response to identify whether, as applicable, only a CDFI Fund-approved CDFI Certification Target Market Assessment Methodology(ies) has been and will continue to be used to determine whether credit union members are part of a particular eligible market type.</p> <p>The response should address whatever overall market is relevant to the purpose of the board record, whether it be the Applicant’s CDFI Certification Target Market, the CDFI Certification collective review market for an entity relevant to the Applicant’s CDFI Certification collective review process, or a Native Community(ies) if the Applicant seeks the Native American CDFI designation.</p> <p><b>If “No,”</b> because the Applicant cannot attest that, as applicable, only a CDFI Fund-approved CDFI Certification or, if applicable, Native American CDFI designation Target Market Assessment Methodology(ies) has been and will continue to be used to determine whether credit union members are part of a particular eligible market type, the advisory board and credit union member method of Accountability cannot be used.</p> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li><a href="#">Pre-Approved CDFI Certification Target Market Assessment Methodologies</a></li> </ul>			
<p><i>If board type is advisory board <b>and</b> method of Accountability is Advisory board and credit union membership Native Community(ies) level (for Native American CDFI designation; for credit unions only):</i></p>			
Field	AMIS	Field Type	Numeric
Field Label/Question Text	<p><u>If board type is advisory board <b>and</b> method of Accountability is Advisory board and credit union membership Native Community(ies) level (for Native American CDFI designation; for credit unions only):</u></p>		

	Advisory board and credit union membership Native Community(ies) level method of Accountability for Native American CDFI designation – total number of credit union members active with the Applicant as of the end of the most recently completed Fiscal Year		
<b>Response</b>	Enter number		
<b>Response Instruction(s)</b>			
<p>Enter the total number of credit union members active with the entity served by the advisory board as of the last day of that entity’s most recently completed fiscal year.</p> <p>While the label/question for this field indicates that data on the Applicant’s credit union member status should be entered, the data should reflect the status of whatever entity’s Accountability information is being presented (e.g. if the board record is for the Applicant, then it is the Applicant’s status that matters; if the board record is for an entity relevant to the Applicant’s collective review then it is the entity relevant to the collective review about which the response should be given; if the board record is for a Controlling entity providing accountability to another entity, then it is the Controlling entity about which the response should be given).</p>			
<b>Field</b>	<b>AMIS</b>	<b>Field Type</b>	Picklist and Numeric
<b>Field Label/Question Text</b>	<p><u>If board type is advisory board <b>and</b> method of Accountability is Advisory board and credit union membership Native Community(ies) level (for Native American CDFI designation; for credit unions only):</u></p> <p>Advisory board and credit union membership Native Community(ies) level method of Accountability for Native American CDFI designation – number of credit union members that are members of Native Communities</p>		
<b>Response</b>	Identify Native Community type(s) and enter the unduplicated number of credit union members part of the identified market type(s) counting a credit union member as part of only one of the Native Community market types for which they might qualify.		
<b>Response Instruction(s)</b>			
<p>Identify the CDFI Certification Target Market, CDFI Certification collective review market or, if applicable, Native American CDFI designation market type(s) relevant to the purpose of the board record and enter the unduplicated/non-overlap number of credit union members classified as being part of the applicable market type(s) with no overlap between market types (i.e., counting a credit union member as part of only one of the market types for which they might qualify).</p> <p>While the field label/question and/or other text prompts for this field in the CDFI Certification Application form in AMIS may indicate that the response should only ever address CDFI Certification Target Market information, the response should actually address whatever overall market is relevant to the purpose of the board record, whether it be the Applicant’s CDFI Certification Target Market; or,</p>			

if applicable, the CDFI Certification collective review market for an entity relevant to the Applicant’s CDFI Certification collective review process; or, if applicable, a Native Community(ies) if the Applicant seeks the Native American CDFI designation.

If the Accountability information being presented is for the CDFI Certification Applicant in connection with the Native American CDFI designation, enter the number of the credit union members active with the Applicant as of the last day of its most recently completed fiscal year that are part of each Native Community market type in its Native American CDFI Native Communities market.

To determine the number of credit union members that are part of each relevant market type, the CDFI Fund-approved CDFI Certification market assessment methodologies must be used (see Pre-Approved CDFI Certification Market Assessment Methodologies).

By Native Community(ies) Target Market Assessment Methodology(ies), the CDFI Fund means a CDFI Certification Target Market Assessment Methodology(ies) applicable to a Native Community market type(s).

The credit union member market levels are not allowed to be determined via an estimation process (this includes using the credit union’s eligible Financial Products activity market level data for that purpose) but must instead be verified based on a direct assessment of the credit union member data itself. If this is not possible for a credit union, contact the CDFI Fund via an AMIS Service Request for assistance.

Check that at least 33% (no rounding of percentage allowed) of the credit union members are part of the relevant overall market relevant to the purpose of the board record.

If, as applicable based on the purpose of the board record, the overall credit union member CDFI Certification Target Market, CDFI Certification collective review market or Native American CDFI designation market type(s) level is less than 33% (no rounding of percentage allowed) using all relevant market types, the advisory board with credit union member method of Accountability cannot be used.

Field	AMIS	Field Type	Auto calculated
Field Label/Question Text	If board type is advisory board <b>and</b> method of Accountability is <u>Advisory board and credit union membership Native Community(ies) level (for Native American CDFI designation; for credit unions only):</u> Advisory board and credit union membership Native Community(ies) level method of Accountability for Native American CDFI designation – percentage of credit union members that are members of Native Communities		
Response	Auto calculated		
Response Instruction(s)			
If visible in the CDFI Certification Application form in AMIS, this field will be auto calculated.			

Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p>If board type is advisory board <b>and</b> method of Accountability is <u>Advisory board and credit union membership Native Community(ies) level (for Native American CDFI designation; for credit unions only):</u> Advisory board and credit union membership Native Community(ies) level method of Accountability for Native American CDFI designation – Applicant attests that only a CDFI Fund-approved Native Community assessment methodology(ies) has been and will continue to be used to determine whether credit union members are part of a Native Community.</p>		
Response	Yes or No		
Response Instruction(s)			
<p>Select the appropriate response to identify whether, as applicable, only a CDFI Fund-approved CDFI Certification Target Market Assessment Methodology(ies) has been and will continue to be used to determine whether credit union members are part of a particular eligible market type.</p> <p>By Native Community(ies) Target Market Assessment Methodology(ies), the CDFI Fund means a CDFI Certification Target Market Assessment Methodology(ies) applicable to a Native Community market type(s).</p> <p>While the field label/question and/or other text prompts for this field in the CDFI Certification Application form in AMIS may indicate the response should only address CDFI Certification Target Market information, the response should instead address whatever overall market is relevant to the purpose of the board record, whether it be the Applicant’s CDFI Certification Target Market; or, if applicable, the CDFI Certification collective review market for an entity relevant to the Applicant’s CDFI Certification collective review process; or, if applicable, a Native Community(ies) if the Applicant seeks the Native American CDFI designation.</p> <p><b>If “No,”</b> because the Applicant cannot attest that, as applicable, only a CDFI Fund-approved CDFI Certification Target Market Assessment Methodology(ies) has been and will continue to be used to determine whether credit union members are part of a particular eligible market type, the advisory board and credit union member method of Accountability cannot be used.</p>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	Board Status		
Response	<p>Select one:</p> <ul style="list-style-type: none"> <li>• In progress</li> <li>• Record complete/ready for submission</li> <li>• Proposed (auto populated only).</li> </ul>		

Response Instruction(s)
<p>Select the appropriate response to identify the board status.</p> <p>A board record will start in an “in progress” status. It will stay in that status until the Applicant moves it to the record complete status.</p> <p>A board record will be moved by the Applicant to the “Record complete/ready for submission” status when all board, board member, and accountable board member information for that board is complete and accurate. A board record must be in the “Record complete/ready for submission” status in order for it to be linked to the relevant CDFI Certification Application. The board record can be moved back and forth between in progress and “Record complete/ready for submission” as needed.</p> <p>A board linked to a CDFI Certification Application will be put into the “Proposed” status automatically once the relevant Application has been submitted.</p>

**Accountability – Board Member Records – (AC-GA) Data Fields**

<p><i>The following fields will be completed in the board record created in an entity’s AMIS account. The data entry will be repeated for each member of the relevant board.</i></p>			
Field	AMIS	Field Type	Auto populated
Field Label/Question Text	Program Profile		
Response	If not auto populated, select Program Profile from dropdown list of active Program Profile numbers.		
Response Instruction(s)			
If this field appears in the board member record it will either be auto populated, or the Applicant will use a look-up process find and select the needed information.			
Field	AMIS	Field Type	Auto populated
Field Label/Question Text	CDFI Certification form ID		
Response	If not auto populated, select form ID for the CDFI Certification form in connection with which the board is being presented from dropdown list of active form ID numbers.		
Response Instruction(s)			
If this field appears in the board member record it will either be auto populated or the Applicant will use a look-up process find and select the needed information.			

Field	AMIS	Field Type	Auto populated
Field Label/Question Text	CDFI Certification control number		
Response	Auto populated from the CDFI Certification Application		
<b>Response Instruction(s)</b>			
<p>The auto populated response reflects the CDFI Certification control number assigned to the Application.</p> <p>The CDFI Certification control number will not show until the board has been linked to the CDFI Certification Application.</p>			
Field	AMIS	Field Type	Text
Field Label/Question Text	Board member name		
Response	Enter name		
<b>Response Instruction(s)</b>			
<p>Enter the name of an individual who sits on the board being presented as a means of Accountability. A board member record should be created separately and individually for each board member on the relevant board as of a single point in time no more than 45 days prior to the date when the CDFI Certification Application is submitted. Submission date is determined by the Eastern time submission time stamp on the Application.</p> <p>Within a particular board record, board member records must only be for the members of that specific board. Do not list board members from multiple boards within a single board record.</p> <p>Do not create board member record for past or intended future members of the board. Only create board member records for the individuals that are actually on the board as of the relevant point in time. This includes staff members of the entity the board serves.</p>			
Field	AMIS	Field Type	Auto populated
Field Label/Question Text	Board record name		
Response	Auto populated		
<b>Response Instruction(s)</b>			
<p>This field will be auto populated based on the name given to the board record within which the board member sub-record is created.</p>			

Field	AMIS	Field Type	Picklist
<b>Field Label/Question Text</b>	<u>If the board record type is advisory board:</u> Does the member of the advisory board also serve on the Applicant’s governing board or is the member also a partner/owner?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to identify whether the relevant board member is also a governing leader for the entity whose board information is being provided.</p> <p>The response should address the board member’s governing leadership status in connection with whatever entity’s board information is being presented, rather than the board member’s governing leadership status with the Applicant as indicated by the field label/question. That is, by “does the member also serve on the governing board, or is a partner/owner,” the CDFI Fund means, “Is the member of the board also a governing leader for the entity whose board information is being provided?”</p>			
Field	AMIS	Field Type	Picklist
<b>Field Label/Question Text</b>	<b>Financial interest status</b> - Is this board member or any covered member of their family an employee of the Applicant or any of its Affiliates?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to identify whether the board member being listed or any covered member of their family (see below) is an employee of the entity whose board information is being presented or any Affiliate of that entity.</p> <p>The response should address the status of the relevant board member and of their covered family members with regard to the entity whose board information is being presented or any Affiliate of that entity, rather than address whether the relevant board member or any of their covered family members (see below) is an employee of the Applicant or any Affiliate of the Applicant as the field label/question for this field indicates.</p> <p>By employee, the CDFI Fund means paid direct employee (i.e., someone who is considered to be an employee for payroll purposes).</p> <p><b>If “Yes,”</b> this board member is considered to have a financial interest that makes them ineligible to be presented as accountable.</p> <p>Covered family members include spouses; children (including step-, in-law, and adopted children); or other family members of the board member’s household (i.e., siblings (including step-, half, and in-</p>			

law siblings); parents (including step- and in law parents); and grandparents related by blood or adoption.			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<b>Financial interest status</b> - Does the board member or any covered member of their family, individually or in combination control 25% or more of the Applicant or any of its Affiliates?		
Response	Yes or No		
Response Instruction(s)			
<p>Select the appropriate response to identify whether the board member being listed or any covered member of their family (see below), individually or in combination with each other, owns 25% or more of or Controls the entity whose board information is being presented or any of its Affiliates.</p> <p>While the field label/question for this field indicates that the response should only address the ownership/Control status of the board member and of their covered family members (see below) in connection with the Applicant or an Affiliate of the Applicant, it should address the status of the relevant board member and of their covered family members with regard to the entity whose board information is being presented or any Affiliate of that entity.</p> <p><b>If “Yes,”</b> this board member is considered to have a financial interest that makes them ineligible to be presented as accountable.</p> <p>Covered family members include spouses; children (including step-, in-law, and adopted children); or other family members of the board member’s household (i.e., siblings (including step-, half, and in-law siblings); parents (including step- and in-law parents); and grandparents related by blood or adoption.</p>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<b>Financial interest status</b> - Does the board member, the board member’s employer, or any covered member of the board member’s family have an active Financial Product from the Applicant?		
Response	Yes or No		
Response Instruction(s)			
<p>Select the appropriate response to identify whether the board member being listed, their employer or any covered member of their family (see below) have an active Financial Products from the entity whose board information is being presented.</p> <p>The response should address the status of the relevant board member, their employer and of their covered family members with regard to the entity whose board information is being presented, rather than address the active Financial Products status of the board member, their employer or any</p>			

<p>of their covered family members (see below) in connection with the Applicant as the field label/question for this field indicates.</p> <p>Covered family members include spouses; children (including step-, in-law, and adopted children); or other family members of the board member’s household (i.e., siblings (including step-, half, and in-law siblings); parents (including step- and in-law parents); and grandparents related by blood or adoption.</p>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p><b>If “Yes”</b> to the preceding field:  <b>Financial interest status</b> - Does the Applicant have policies requiring such board members to recuse themselves from any decision that may affect, directly or indirectly, their Financial Product or relationship?</p>		
Response	Yes or No		
Response Instruction(s)			
<p>Select the appropriate response to identify whether whatever entity’s board information is being presented has a policy(ies) requiring that if a board member, their employer or any of their covered family members has an active Financial Products from that particular entity, they must recuse themselves from any board decision that may affect, directly or indirectly, their Financial Products or relationship with the entity that the board serves.</p> <p>The response should address the status of the entity whose board information is being presented, rather than address the Applicant’s status with regard to the relevant standard/requirement as the field label/question for this field indicates.</p> <p><b>If “No,”</b> this board member is considered to have a financial interest that makes them ineligible to be presented as accountable.</p> <p>If a board member, their employer or any of their covered family members has an active Financial Products from the entity whose board information is being presented, having a policy(ies) requiring such a board member to recuse themselves from any board decision that may affect, directly or indirectly, their Financial Products or relationship with the entity that the board serves mitigates the potential financial interest issue that could arise due to the Financial Products situation, allowing a board member in that situation to remain eligible to be presented as an accountable board member.</p>			

### 5.9.4. Accountability – CDFI Certification Accountable Member Records

#### **Accountable Governing and/or Advisory Board Member Records – (AC-GA) Data Fields**

*The following fields will be completed in the board member records created within a board record in an entity’s AMIS account.*

*If the purpose of a board record is to present Accountability information for the Native American CDFI designation, see the guidance on creating an accountable board member record in the Native American CDFI designation section of this manual.*

*The data entry for the accountable board member records will be repeated for each member of the applicable board that the Applicant believes is accountable to a component(s) of whatever overall market is relevant to the purpose of the particular board record (i.e., the Applicant’s CDFI Certification Target Market; if applicable, the CDFI Certification collective review market for an entity relevant to the Applicant’s CDFI Certification collective review process; or, if applicable, the Applicants Native American CDFI designation market), as well as for each market component for which a particular board member is believed to meet the Accountability requirements.*

Field	AC-GA11	Field Type	Picklist
<b>Field Label/Question Text</b>	<b>CDFI Certification accountable board member - Target Market types</b> to which the board member is accountable.		
<b>Response</b>	Select one: <ul style="list-style-type: none"> <li>• Investment Area – Pre-qualified</li> <li>• Investment Area – Customized</li> <li>• Investment Area – Non-Metro Customized</li> <li>• Investment Area – Non-Metro counties/parishes</li> <li>• Low-Income Targeted Population</li> <li>• Other Targeted Population – African American</li> <li>• Other Targeted Population – Hispanic</li> <li>• Other Targeted Population – Native American</li> <li>• Other Targeted Population – Native Alaskan</li> <li>• Other Targeted Population – Native Hawaiian</li> <li>• Other Targeted Population – Other Pacific Islander</li> <li>• Other Targeted Population – Filipino</li> <li>• Other Targeted Population – Vietnamese</li> <li>• Other Targeted Population – Persons with Disabilities</li> <li>• Other Targeted Population – Certified CDFI(s)</li> <li>• New Targeted Population (Pre-approved by the CDFI Fund).</li> </ul>		

Response Instruction(s)			
<p>Select the appropriate response to identify a market type for a particular component of whatever overall market is relevant to the purpose of the applicable board record to which the Applicant believes the board member is accountable.</p> <p>Relevant overall markets are the Applicant’s CDFI Certification Target Market or, if applicable, the CDFI Certification collective review market for an entity relevant to the Applicant’s CDFI Certification collective review process.</p> <p>If the purpose of the board record is to present Accountability information in connection with the Native American CDFI designation, see guidance on creating and completing accountable board member records in the Native American CDFI designation section of this guidance manual.</p> <p>A separate accountable board member record/sub-page must be created in a board member’s record for each market component to which the Applicant believes the board member is accountable.</p>			
Field	AMIS	Field Type	Look-up
Field Label/Question Text	Target Market name		
Response	Select Target Market record name		
Response Instruction(s)			
<p>Use the look-up function in this field to find the CDFI Certification market record(s) in the AMIS account of whatever entity’s Accountability information is being provided that represents the market component to which the board member is being presented as accountable and then enter that CDFI Certification market record as the chosen response by selecting it from the look-up results list.</p> <p>Make sure that the market record has been selected from the correct AMIS account for the entity whose Accountability information is being provided. If the purpose of the board record is to provide board information for a Controlling entity whose Accountability status is being used by an entity relevant to another entity’s CDFI Certification collective review process and that does not engage in any eligible Financial Products and/or eligible Financial Services activity, the CDFI Certification market records should be selected from the AMIS account of the entity using the Controlling entity.</p>			

**Source of Accountability – Investment Area - (AC-GA) Data Fields**

<i>Questions will be asked <b>only</b> of board members identified as accountable to a Pre-qualified Investment Area.</i>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	Investment Area – Source(s) of Accountability		
Response	Select all that apply:		

	<ul style="list-style-type: none"> <li>• Primary residence in a qualified census tract in the Investment Area geography</li> <li>• Owner of a small business primarily located in a qualified census tract(s) in a qualified census tract(s) in the IA geography</li> <li>• Owner of a small business that principally provides goods or services to residents of a qualified census tract(s) in the IA geography</li> <li>• Owner of a small business that principally employs residents of a qualified census tract(s) in the IA geography</li> <li>• Elected official that primarily represents residents of a qualified census tract(s) in the IA geography.</li> <li>• Staff member of a non-Affiliated, third-party, community development mission-driven organization that primarily serves residents of a qualified census tract(s) in the IA geography.</li> <li>• Enrollment in a federally recognized tribe (for Applicants serving IA(s) in a Native Community geography(ies) only)</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response(s) to identify the source(s) of Accountability the relevant board member has to the specific component of whatever overall market is relevant to the purpose of the applicable board record to which the board member is being presented as accountable.</p> <p>By staff member of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes).</p> <div style="border: 1px solid black; background-color: #fff9c4; padding: 5px; margin: 10px 0;"> <p><b>Note:</b> Accountable board members must continuously maintain an acceptable source of Accountability or they can no longer be considered accountable.</p> </div> <p><b>Review the following information before completing this field:</b></p> <ul style="list-style-type: none"> <li>• Key Term – small business</li> <li>• Key Term – Affiliate</li> <li>• CDFI Certification Accountability requirements, particularly sources of Accountability for Investment Areas</li> </ul>			
<p><i>If source of Investment Area Accountability is primary residence in a qualified census tract in the Investment Area geography:</i></p>			
<b>Field</b>	<b>AMIS</b>	<b>Field Type</b>	<b>Numeric</b>
<b>Field Label/Question Text</b>	<p><b>Investment Area Accountability</b> – primary residence in a qualified census tract in the Investment Area geography - FIPS code for the census tract in which the board member resides.</p>		
<b>Response</b>	<p>Enter FIPS code. (Include leading zeros where appropriate)</p>		

Response Instruction(s)			
<p>Enter the Federal Information Processing Standards (FIPS) code for the census tract where the board member resides.</p> <p>To be accountable to an Investment Area as a resident of a qualified census tract in the Investment Area geography, a board member’s primary place of residence must be within a qualified census tract within the specific geography associated with, as applicable, the Investment Area Target Market or CDFI Certification collective review market component to which they have been presented as accountable. For the pre-qualified, non-customized Investment Area Target Market type, the relevant Investment Area geography is the United States, its territories, and the District of Columbia. For customized Investment Areas, the relevant Investment Area geography is whatever geography has been identified for that particular market via a CIMS map in AMIS.</p> <p>The Federal Information Processing Standards (FIPS) code uniquely identifies states and counties and county equivalents and census tracts in the United States, certain U.S. possessions, and certain freely associated states.</p> <p>The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When using the resident of a qualified census tract within the relevant Investment Area geography source of Accountability, the documentation should include the address of the board member and proof that the location provided is the board member’s primary place of residence. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.</p>			
<p><i>If source of Investment Area (IA) Accountability is owner of a small business primarily located in a qualified census tract(s) in the IA geography <u>or</u> owner of a small business that principally employs residents of a qualified census tract(s) in the IA geography <u>or</u> owner of small business that principally provides goods or services to residents of a qualified census tract(s) in the IA geography:</i></p>			
Field	AMIS	Field Type	Numeric
Field Label/Question Text	What percentage of ownership does the board member have in the business?		
Response	Enter percentage		
Response Instruction(s)			
<p>Enter the percentage of the small business owned by the board member.</p> <p>A board member must own at least 25% of a small business to be presented as an owner of that business.</p> <p>If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability. Information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability</p>			

<p>must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.</p> <p>For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated, that is not dominant in its field on a national basis, and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).</p>			
Field	AMIS	Field Type	Text
Field Label/Question Text	What is the name of the small business owned by the board member?		
Response	Enter name		
Response Instruction(s)			
<p>Enter the legal name of the small business owned by the board member.</p> <p>If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability. Information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information in more than one owned small business cannot be used to meet the requirements of the related source of Accountability.</p> <p>For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).</p>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p><u>If source of Accountability is owner of a small business primarily located in a qualified census tract(s) in the IA geography:</u>  <b>Investment Area Accountability</b> – owner of a small business primarily located in a qualified census tract(s) in the IA geography - Are at least 51% of all the locations for the owned small business in a qualified census tract(s) in the Investment Area geography?</p>		
Response	Yes or No		

Response Instruction(s)			
<p>Select the appropriate response to identify whether at least 51% of all locations for the small business owned by the board member fall within a qualified census tract(s) within the specific geography. The geography should be associated with the Investment Area Target Market or CDFI Certification collective review market component to which the board member has been presented as accountable, as applicable. For the pre-qualified, non-customized Investment Area Target Market type, the relevant Investment Area geography is the United States, its territories, and the District of Columbia. For customized Investment Areas, the relevant Investment Area geography is whatever geography has been identified for that particular market via a CIMS map in AMIS.</p>			
<p>If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability. Information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.</p> <p>For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).</p> <p>The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When using an owned small business as a source of Accountability, the documentation should include the name of the business, the type of business, the business locations, proof that the board member is an owner of the business (i.e., that they own at least 25% of the business), and proof that the business qualified as a small business per CDFI Certification standards. The documentation should also include information on how the business meets all other relevant CDFI Certification-related source of Accountability requirements. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.</p> <p><b>If “No,”</b> the owner of a small business primarily located in a qualified census tract(s) in the Investment Area geography source of Accountability cannot be used to demonstrate accountability to the Investment Area Target Market component.</p>			
Field	AMIS	Field Type	Text
Field Label/Question Text	<p><u>If source of Accountability is owner of a small business primarily located in a qualified census tract(s) in the IA geography <b>and</b> at least 51% of the locations for the owned small business are in qualified census tract(s) within the Investment Area geography:</u></p>		

	<p><b>Investment Area Accountability</b> – owner of a small business primarily located in a qualified census tract(s) in the IA geography – map in CIMS that identifies the census tract for each of location of the owned small business.</p>
<b>Response</b>	Enter map name
<b>Response Instruction(s)</b>	
<p>Enter the name of the CIMS map in AMIS that identifies the census tract(s) for each location of the small business owned by the board member.</p> <p>The CIMS map should help to substantiate that at least 51% of all locations for the small business owned by the board member fall within a qualified census tract(s) within the specific geography associated with, as applicable, the Investment Area Target Market or CDFI Certification collective review market component to which the board member has been presented as accountable. For the pre-qualified, non-customized Investment Area Target Market type, the relevant Investment Area geography is the United States, its territories, and the District of Columbia. For customized Investment Areas, the relevant Investment Area geography is whatever geography has been identified for that particular market via a CIMS map in AMIS.</p> <div style="border: 1px solid black; background-color: #fff9c4; padding: 10px; margin: 10px 0;"> <p><b>NOTE:</b> If multiple locations for the small business owned by the board member fall within a single census tract(s), attach a document in field BI21 in the Basic Information section of the Application that lists any census tract where this occurs and indicates how many of the business locations are in each such census tract.</p> <p><b>Name the attachment: “Owned small business Accountability info.”</b></p> </div> <p>If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability. Information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.</p> <p>For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).</p> <p>The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When using an owned small business as a source of Accountability, the documentation should include the name of the business, the type of business, the business locations, proof that the board member is an owner of the business (i.e., that they own at least 25% of the business), and proof that the business qualified as a small business per CDFI Certification standards. The documentation should also include information on how the business meets all other relevant CDFI Certification-related source of Accountability requirements. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention</p>	

<p>policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.</p>			
Field	AMIS	Field Type	Narrative
Field Label/Question Text	<p>If source of Investment Area Accountability is owner of small business that principally employs residents of a qualified census tract(s) in the IA geography:</p> <p><b>Investment Area Accountability</b> – owner of a small business that principally employs residents of a qualified census tract(s) in the IA geography – description of how the small business demonstrates that it principally employs residents of a qualified census tract(s) in the Investment Area geography.</p>		
Response	Provide narrative		
Response Instruction(s)			
<p>Provide a clear and detailed explanation of the process the Applicant used to determine that the small business owned by the board member primarily employs residents of a qualified census tract(s) within the specific geography associated with, as applicable, the Investment Area Target Market or CDFI Certification collective review market component to which the board member has been presented as accountable, that includes the data resulting from the assessment. For the pre-qualified, non-customized Investment Area Target Market type, the relevant Investment Area geography is the United States, its territories, and the District of Columbia. For customized Investment Areas, the relevant Investment Area geography is whatever geography has been identified for that particular market via a CIMS map in AMIS.</p> <p>For a small business owned by a board member to be accepted as principally employing residents of a qualified census tract(s) in the relevant Investment Area geography, at least 51% of all employees must be residents of a qualified census tract(s) anywhere in the United States, its territories, and/or the District of Columbia, and, for customized Investment Areas, the focus needs to be specifically on the residents of a qualified census tract(s) within the relevant customized Investment Area geography.</p> <p>If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability. Information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.</p> <p>For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR</p>			

1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When using an owned small business as a source of Accountability, the documentation should include the name of the business, the type of business, the business locations, proof that the board member is an owner of the business (i.e., that they own at least 25% of the business), and proof that the business qualifies as a small business per CDFI Certification standards. The documentation should also include information on how the business meets all other relevant CDFI Certification-related source of Accountability requirements. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

The Applicant must provide a clear explanation of how the Applicant determined that the small business owned by the board member primarily serves/is accountable to residents of a qualified census tract(s) within the specific geography. This includes the Investment Area Target Market or CDFI Certification collective review market component to which the board member has been presented as accountable. The explanation should identify the area served by the business, as well as exactly what factors and information were taken into consideration to make the determination and includes the data resulting from the assessment.

For the pre-qualified, non-customized Investment Area Target Market type, the relevant Investment Area geography encompasses the United States, its territories, and the District of Columbia. For customized Investment Areas, the relevant Investment Area geography is defined by the CIMS map in AMIS.

Field	AMIS	Field Type	Text
<b>Field Label/Question Text</b>	<p><u>If source of Investment Area Accountability is owner of small business that principally provides goods or services to residents of a qualified census tract(s) in the IA geography:</u></p> <p><b>Investment Area Accountability</b> – owner of a small business that principally provides goods/services to residents of a qualified census tract(s) in the IA geography – map(s) in CIMS of the overall geography(ies) served by the owned small business</p>		
<b>Response</b>	Enter map(s) name		
<b>Response Instruction(s)</b>			
<p>Enter the name of the CIMS map(s) in AMIS that identifies the overall geography(ies) served by the small business owned by the board member.</p> <p>Multiple CIMS maps will only be needed if the small business owned by the board member serves non-contiguous geographies.</p>			

All areas served by the small business, including international activity, must be taken into consideration.

The CIMS map(s) may substantiate that the small business owned by the board member primarily serves residents of a qualified census tract(s) within the specific geography associated with, as applicable, the Investment Area Target Market or CDFI Certification collective review market component to which the board member has been presented as accountable. For example, it is reasonable to assume that the small business owned by the board member primarily serves residents of a qualified census tract(s) within the relevant Investment Area geography if, per CIMS, enough of the population in the area(s) served by that small business resides within a qualified census tract(s) within the Investment Area. For the pre-qualified, non-customized Investment Area Target Market type, the relevant Investment Area geography is the United States, its territories, and the District of Columbia. For customized Investment Areas, the relevant Investment Area geography is whatever geography has been identified for that particular market via a CIMS map in AMIS.

If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability. Information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.

For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When using an owner of a small business as a source of Accountability, the documentation should include the name of the business, the type of business, the business locations, proof that the board member is an owner of the business (i.e., that they own at least 25% of the business), proof that the business qualified as a small business per CDFI Certification standards. The documentation should also include information on how the business meets all other relevant CDFI Certification-related source of Accountability requirements. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

Field	AMIS	Field Type	Narrative
Field Label/Question Text	<p><u>If source of Investment Area Accountability is owner of small business that principally provides goods or services to residents of a qualified census tract(s) in the IA geography:</u></p> <p><b>Investment Area Accountability</b> – owner of a small business that principally provides goods/services to residents of a qualified census tract(s) in the IA geography – description of how the small business</p>		

	demonstrates that it principally provides good or services to residents of a qualified census tract(s) in the Investment Area geography.
<b>Response</b>	Provide narrative
<b>Response Instruction(s)</b>	
<p>Provide a clear and detailed explanation of how the small business owned by the board member primarily serves residents of a qualified census tract(s) within the specific geography associated with, as applicable, the Investment Area Target Market or CDFI Certification collective review market component to which the board member has been presented as accountable. The narrative should include the factors taken into consideration, the data resulting from the assessment and should identify the area served by the relevant business. For the pre-qualified, non-customized Investment Area Target Market type, the relevant Investment Area geography is the United States, its territories, and the District of Columbia. For customized Investment Areas, the relevant Investment Area geography is whatever geography has been identified for that particular market via a CIMS map in AMIS.</p> <p>For a small business owned by a board member to be accepted as principally serving residents of a qualified census tract(s) in the relevant Investment Area geography, the business must focus at least 51% of its operations on residents of a qualified census tract(s) anywhere in the United States, its territories, and/or the District of Columbia, and, for customized Investment Areas, the focus needs to be specifically on the residents of a qualified census tract(s) within the relevant customized Investment Area geography.</p> <p>If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability. Information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.</p> <p>For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).</p> <p>The Applicant must maintain records that demonstrate that all conditions of the identified source of Accountability have been met. When using an owner small business as a source of Accountability, the documentation should include the name of the business, the type of business, the business locations, proof that the board member is an owner of the business (i.e., that they own at least 25% of the business), proof that the business qualifies as a small business per CDFI Certification standards. Documentation should also include information on how the business meets all other relevant CDFI Certification-related source of Accountability requirements. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.</p>	

The Applicant must provide a clear explanation of how the small business owned by the board member primarily serves or is accountable to residents of a qualified census tract(s) within the specific geography. This includes the Investment Area Target Market or CDFI Certification collective review market component to which the board member has been presented as accountable. The explanation should not only identify the area served by the business, but also include the information that was taken into consideration and the data resulting from the assessment.

For the pre-qualified, non-customized Investment Area Target Market type, the relevant Investment Area geography encompasses the United States, its territories, and the District of Columbia. For customized Investment Areas, the relevant Investment Area geography is defined by the CIMS map in AMIS.

*If source of Investment Area Accountability is elected official that primarily represents residents of a qualified census tract(s) in the Investment Area geography:*

Field	AMIS	Field Type	Text
Field Label/Question Text	<b>Investment Area Accountability</b> – elected official that primarily represents residents of a qualified census tract(s) in the IA geography – elected official’s office and jurisdiction		
Response	Enter the name of the office and jurisdiction.		

**Response Instruction(s)**

Provide the name of the board member’s elected office, including the unit of government and the specific jurisdiction they represent in their capacity as an elected official.

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

Field	AMIS	Field Type	Text
Field Label/Question Text	<b>Investment Area Accountability</b> – elected official that primarily serves residents of a qualified census tract(s) in the IA geography – map in CIMS of the geography served by the elected official		
Response	Map name		

**Response Instruction(s)**

Enter the name of the CIMS map in AMIS that identifies the geography for the jurisdiction served by the board member in their role as an elected official.

The CIMS map should substantiate that the elected official primarily serves residents of a qualified census tract(s) within the specific geography associated with, as applicable, the Investment Area Target Market or CDFI Certification collective review market component to which the board member has been presented as accountable. For example, it is reasonable to assume that the elected official primarily serves residents of a qualified census tract(s) within the relevant Investment Area geography if, per CIMS, enough of the population in the elected official’s jurisdiction resides within a qualified census tract(s) within the Investment Area. For the pre-qualified, non-customized Investment Area Target Market type, the relevant Investment Area geography is the United States, its territories, and the District of Columbia. For customized Investment Areas, the relevant Investment Area geography is whatever geography has been identified for that particular market via a CIMS map in AMIS.

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

*If source of Investment Area Accountability is staff member of a non-Affiliated, third-party, community development mission-driven organization that primarily serves residents of a qualified census tract(s) in the Investment Area geography:*

**Source of Accountability – Low-Income Targeted Population -(AC-GA) Data Fields**

*If source of **Low-Income Targeted Population Accountability** is staff member of a non-Affiliated, third-party, community development mission-driven organization that primarily provides services to Low-Income people in the United States, its territories, and/or the District of Columbia:*

*Questions will be asked only for board members identified as accountable to a **Low-Income Targeted Population**.*

Field	AMIS	Field Type	Picklist
Field Label/Question Text	Low-Income Targeted Population – source(s) of Accountability		
Response	Select all that apply: <ul style="list-style-type: none"> <li>• Low-Income individual</li> <li>• Staff member of a non-Affiliated third-party, community development mission-driven entity that primarily provides services to Low-Income people</li> </ul>		

Response Instruction(s)			
<p>Select the appropriate response(s) to identify the source(s) of Accountability the relevant board member has to the specific component of whatever overall market is relevant to the purpose of the applicable board record.</p> <p>By Low-Income individual, the CDFI Fund means a Low-Income individual that resides in the United States, its territories, or the District of Columbia.</p> <p>By staff member of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes).</p>			
<p><b>NOTE:</b> Accountable board members must continuously maintain an acceptable source of Accountability or they can no longer be considered accountable.</p>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p><u>If source of Low-Income Targeted Population Accountability is Low-Income individual:</u></p> <p><b>Low-Income Targeted Population Accountability</b> – Low-Income individual - Applicant attests that the board member is Low-Income</p>		
Response	Yes or No		
Response Instruction(s)			
<p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>Select the appropriate response to identify whether the Applicant attests that the board member qualifies as Low-Income and resides in the United States, its territories, or the District of Columbia.</p> <p>By Low-Income individual, the CDFI Fund means a Low-Income individual that resides in the United States, its territories, or the District of Columbia.</p> <p>Review the CDFI Certification guidance on Pre-Approved CDFI Certification Market Assessment Methodologies for information on acceptable methods for determining an individual’s income level.</p> <p>The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When a board member is presented as a member of the Low-Income Targeted Population, the documentation should include information on how the board member’s income status and place of residence was determined. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.</p>			

Field	AMIS	Field Type	Text
Field Label/Question Text	<b>Low-Income Targeted Population Accountability</b> – staff member of non-Affiliated third-party, community development mission-driven entity that primarily serves Low-Income people – name of non-Affiliated third-party entity		
Response	Enter name		
<b>Response Instruction(s)</b>			
<p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>Enter the name of the non-Affiliated, third-party, community development mission-driven entity where the board member is employed.</p> <p>“Primarily serving” means at least 51% of the entity’s activity is directed in the needed way.</p> <p>By community development mission-driven entity, the CDFI Fund means an entity that has a community development mission or purpose.</p> <p>By staff member of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes).</p> <p>By Low-Income people, the CDFI Fund means Low-Income people in the United States, its territories, and/or the District of Columbia.</p> <p>The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must not be Affiliated with either the Applicant or, if another entity’s board information is being provided, with that other entity.</p> <p>The non-Affiliated, third-party, community development mission-driven entity where the board member is employed does not have to be a nonprofit, but it must have a community development mission or purpose.</p> <p>The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must be focused on serving people within the United States, its territories, and/or the District of Columbia, otherwise it will not be able to meet the requirement that it primarily serves Low-Income people within that particular geographic area.</p>			
Field	AMIS	Field Type	Text
Field Label/Question Text	<b>Low-Income Targeted Population Accountability</b> – staff member of non-Affiliated third-party, community development mission-driven entity that primarily serves Low-Income people – mission statement of non-Affiliated third-party entity		
Response	Enter mission statement		

Response Instruction(s)			
<p>Enter the mission statement for the non-Affiliated third-party community development, mission-driven entity where the board member is employed verbatim as it appears in a binding governing leadership-approved document of record. The Applicant must also indicate the source document (e.g., governance document such as the bylaws or similar, organizing document, such as articles of incorporation, etc.).</p> <p>Do not paraphrase the mission statement.</p> <p>For information on the type of language that indicates a community development mission/purpose, see the <a href="#">Primary Mission</a> section of this guidance manual. Community development does not need to be the primary mission of the non-Affiliated third-party community development, mission-driven entity where the board member is employed, but it must at least be a clear part of its mission/purpose.</p> <p>By staff member of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes).</p>			
Field	AMIS	Field Type	Narrative
Field Label/Question Text	<p><b>Low-Income Targeted Population Accountability</b> – staff member of non-Affiliated third-party, community development mission-driven entity that primarily serves Low-Income people – description of how the board member’s place of employment allows them to primarily serve Low-Income people.</p>		
Response	Provide narrative		
Response Instruction(s)			
<p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>Provide a clear and detailed explanation of the process the Applicant used to determine that the non-Affiliated, third-party, community development mission-driven entity where the board member is employed primarily serves Low-Income people within the United States, its territories, and/or the District of Columbia. The explanation should also identify the area served by the relevant entity, as well as exactly what factors and information were taken into consideration to make the determination and includes the data resulting from the assessment.</p> <p>“Primarily serving” means at least 51% of the entity’s activity is directed in the needed way.</p> <p>By community development mission-driven entity, the CDFI Fund means an entity that has a community development mission or purpose.</p> <p>By staff member of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes).</p>			

By Low-Income people, the CDFI Fund means Low-Income people in the United States, its territories, and/or the District of Columbia.

By “description of how the board member’s place of employment allows them to primarily serve Low-Income people,” the CDFI Fund means a description of how the determination was made that the employer primarily serves Low-Income people within the United States, its territories, and/or the District of Columbia, identifying the area served by the relevant entity, as well as exactly what factors and information were taken into consideration to make the determination and presenting the data resulting from the assessment.

All areas and populations served by the non-Affiliated, third-party, community development mission-driven entity where the board member is employed, including international activity, should be identified in the narrative. This information must be taken into consideration in assessing of whether the entity as a whole can be accepted as primarily serving Low-Income people in the United States, its territories, and/or the District of Columbia.

The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must not be Affiliated with either the Applicant or, if another entity’s board information is being provided, with that other entity.

The non-Affiliated, third-party, community development mission-driven entity where the board member is employed does not have to be a nonprofit, but it must have a community development mission or purpose.

The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must be focused on serving people within the United States, its territories, and/or the District of Columbia, otherwise it will not be able to meet the requirement that it primarily serve Low-Income people within that particular geographic area.

For a non-Affiliated, third-party, community development mission-driven entity where a board member is employed to be accepted as primarily serving Low-Income people within the United States, its territories, and/or the District of Columbia, that entity *must as a whole* (not just a specific program or department or employee, but the entity overall) focus at least 51% of its operations on Low-Income people within the United States, its territories, and/or the District of Columbia.

The Applicant must demonstrate that the non-Affiliated third-party community development, mission-driven entity where the board member is employed is focused specifically on serving Low-Income people in the United States, its territories, and/or the District of Columbia. Showing that the entity serves areas identified as economically distressed will not be accepted as an equivalent.

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

An Applicant must provide a clear and detailed explanation of how the Applicant determined that the non-Affiliated, third-party, community development mission-driven entity where the board member is employed primarily serves Low-Income people within the United States, its territories, and/or the District of Columbia. This explanation should identify the area served, outline the factors and information considered and include any data from the assessment.

The Applicant must provide a narrative regarding the non-Affiliated, third-party, community development mission-driven entity where the board member is employed that includes a description of how:

- the employer primarily serves Low-Income people within the United States, its territories, and/or the District of Columbia, including the area served, the factors considered and the assessment data;
- the entity as a whole directs at least 51% of its operations on Low-Income people within the United States, its territories, and/or the District of Columbia; and
- the entity specifically focuses on serving Low-Income people in the United States, its territories, and/or the District of Columbia. Serving areas identified as economically distressed areas is not sufficient.

Per the CDFI Fund, please note the following:

- “Primarily serving” means at least 51% of the entity’s activity is directed toward that purpose.
- “Community development mission-driven entity” is an entity with a community development mission or purpose as indicated by the third-party entity mission.
- A “staff member of a non-Affiliated, third-party, community development mission-driven organization,” refers to a paid, direct employee of such an entity for payroll purposes.
- The phrase “description of how the board member’s employment allows them to primarily serve residents of qualified census tract(s) in the IA geography,” means explaining how the employer primarily serves residents of qualified census tract(s) in the Investment Area geography. This includes identifying the area served and the factors considered in the determination along with supporting data.
- All areas served by third-party entity, including international activity, must be identified in the narrative as this affects whether the entity is considered to primarily serve residents of qualified census tracts in the relevant IA.
- The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must not be affiliated with the Applicant or any other organization affiliated with the entity.
- The non-Affiliated, third-party, community development mission-driven entity where the board member is employed does not have to be a nonprofit but must have a community development mission or purpose.
- The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must focused on serving people within the United States, its territories, and/or the District of Columbia in order to meet the requirement that it primarily serve residents of a qualified census tract(s) within the Investment Area geography.

**Source of Accountability – Other Targeted Population -(AC-GA) Data Fields**

<i>Questions will be asked only for board members identified as <b>accountable to an Other Targeted Population</b></i>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<b>Other Targeted Population Accountability</b> – source(s) of Accountability		

<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>Member of the Other Targeted Population</li> <li>Staff member of a Certified CDFI (OTP-CDFI only)</li> <li>Staff member of a non-Affiliated third-party community development mission-driven entity that primarily provides services to people with disabilities (OTP – Persons with Disability only)</li> <li>Family member of a person with disability (OTP – Persons with Disability only)</li> </ul>		
<b>Response Instruction(s)</b>			
<p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>Select the appropriate response(s) to identify the source(s) of Accountability the relevant board member has to the specific component of whatever overall market is relevant to the purpose of the applicable board record to which the board member is being presented as accountable.</p> <p>By member of the Other Targeted Population, the CDFI Fund means someone who is of the same specific demographic as that of the relevant Other Targeted Population and who resides in the United States, its territories, or the District of Columbia. For Other Targeted Populations that represent race/ethnic groups being part of the same specific demographic as that of the relevant Other Targeted Population means being a member of the specific applicable race/ethnic group.</p> <p>By staff member of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes).</p> <p>By family member of a person with a disability, the CDFI Fund means someone who is a family member of a person with a disability and who resides in the United States, its territories, or the District of Columbia.</p> <div style="border: 1px solid black; background-color: #fff9c4; padding: 5px; margin-top: 10px;"> <p><b>NOTE:</b> Accountable board members must continuously maintain an acceptable source of Accountability, or they can no longer be considered accountable.</p> </div>			
<b>Field</b>	<b>AMIS</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	<p><u>If source of Other Targeted Population Accountability is member of the Other Targeted Population:</u></p> <p><b>Other Targeted Population Accountability</b> – member of the Other Targeted Population - assessment methodology used to confirm status as member of the Other Targeted Population</p>		
<b>Response</b>	Select all that apply (see guidance for acceptable means of assessment by OTP type): <ul style="list-style-type: none"> <li>OTP-AA.1: Self Report.</li> <li>OTP-AA.2: Visual &amp; ID.</li> </ul>		

	<ul style="list-style-type: none"> <li>• OTP-Hisp.1: Self Report.</li> <li>• OTP-Hisp.2: Visual &amp; ID.</li> <li>• OTP-Hisp.3: Surname.</li> <li>• OTP-Native American.1: Self Report.</li> <li>• OTP-Native American.2: Tribal Document.</li> <li>• OTP-Native Alaskan.1: Self Report.</li> <li>• OTP-Native Alaskan.2: Tribal Document.</li> <li>• OTP-Native Hawaiian.1: Self Report.</li> <li>• OTP-Native Hawaiian.2: Registry Card.</li> <li>• OTP-Pacific Islander.1: Self Report.</li> <li>• OTP-Pacific Islander.2: Visual &amp; ID.</li> <li>• OTP-PWD.1: Self Report.</li> <li>• OTP-PWD.2: Visual &amp; ID.</li> <li>• OTP-PWD.3: Technology/ Accessibility.</li> <li>• OTP-PWD.4: Legal Guardianship/Caretaker Documentation</li> <li>• OTP-Certified CDFI.1: Certified</li> <li>• OTP-Filipino.1: Self Report</li> <li>• OTP-Vietnamese.1: Self Report</li> <li>• CDFI Assessment methodology(ies) separately approved by the CDFI Fund</li> </ul>
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**Response Instruction(s)**

Select the appropriate response(s) to identify the method used to verify that the board member is a member of the population(s) to which they are being presented as accountable.

In most, but not all cases, the only way to demonstrate accountability to an Other Targeted Population is for a board member(s) to be a member of that population.

By member of the Other Targeted Population, the CDFI Fund means someone who is of the same specific demographic as that of the relevant Other Targeted Population and who resides in the United States, its territories, or the District of Columbia. For Other Targeted Populations that represent race/ethnic groups being part of the same specific demographic as that of the relevant Other Targeted Population means being a member of the specific applicable race/ethnic group.

Review the CDFI Certification guidance on [Pre-Approved CDFI Certification Market Assessment Methodologies](#) for information on the specifics of the allowed CDFI Certification market assessment methods.

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. For board members presented as accountable as members of an Other Targeted Population, documentation should include information on how the board member’s race/ethnicity status and place of residence was determined. An example may be a copy of a form where the board member self-reported their race/ethnic background along with a copy of their driver’s license to show their place of residence or a copy of a tribal enrollment card along with a passport as evidence that they reside somewhere in the United States. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability

at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.			
Field	AMIS	Field Type	Narrative
<b>Field Label/Question Text</b>	<b>Other Targeted Population Accountability</b> – member of the Other Targeted Population – assessment methodology(ies) separately approved by the CDFI Fund used to confirm status as member of the Other Targeted Population		
<b>Response</b>	Narrative		
<b>Response Instruction(s)</b>			
Applicants do not need to complete this field. If this is a required field, enter “See determination letter.”			
<b>AC-GA29</b> <i>If source of Other Targeted Population Accountability is staff member of a Certified CDFI:</i>			
Field	AMIS	Field Type	Text
<b>Field Label/Question Text</b>	<b>Other Targeted Population Accountability</b> – staff member of a Certified CDFI – name of the Certified CDFI		
<b>Response</b>	Enter name		
<b>Response Instruction(s)</b>			
Enter the name of the Certified CDFI. An entity’s status as a Certified CDFI can be verified using the list of Certified CDFI(s) available at the CDFI Fund’s website. The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process. By staff member of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes).			

<p><i>If source of Other Targeted Population Accountability is staff member of a non-Affiliated third-party, community development mission-driven entity that primarily serves people with disabilities in the United States, its territories, and/or the District of Columbia:</i></p>			
Field	AMIS	Field Type	Text
Field Label/Question Text	<p><b>Other Targeted Population Accountability</b> – staff member of non-Affiliated third-party, community development mission-driven entity that primarily serves people with disabilities in the U.S. or its territories – name of non-Affiliated third-party entity</p>		
Response	<p>Enter name</p>		
Response Instruction(s)			
<p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>Enter the name of the non-Affiliated, third-party, community development mission-driven entity where the board member is employed.</p> <p>“Primarily serving” means at least 51% of the entity’s activity is directed in the needed way.</p> <p>By “community development mission-driven entity,” the CDFI Fund means an entity that has a community development mission or purpose.</p> <p>By “in the U.S. or its territories,” the CDFI Fund means within the United States, its territories, and/or the District of Columbia.</p> <p>By “people with disabilities,” the CDFI Fund means people with disabilities in the United States, its territories, and/or the District of Columbia.</p> <p>By “staff member of a non-Affiliated, third-party, community development mission-driven organization,” the CDFI Fund means a paid direct employee for payroll purposes of such an entity.</p> <p>The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must not be Affiliated with either the Applicant or, if another entity’s board information is being provided, with that other entity.</p> <p>The non-Affiliated, third-party, community development mission-driven entity where the board member is employed does not have to be a nonprofit, but it must have a community development mission or purpose.</p> <p>The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must be focused on serving people within the United States, its territories, and/or the District of Columbia, otherwise it will not be able to meet the requirement that it primarily serves people with disabilities within that particular geographic area.</p>			

Field	AMIS	Field Type	Text
Field Label/Question Text	<b>Other Targeted Population Accountability</b> – staff member of non-Affiliated third-party, community development mission-driven entity that primarily serves people with disabilities in the U.S. or its territories – mission statement of non-Affiliated third-party entity		
Response	Enter mission statement		
<b>Response Instruction(s)</b>			
<p>Enter the mission statement for the non-Affiliated third-party community development, mission-driven entity where the board member is employed verbatim as it appears in a binding governing leadership-approved document of record that identifies that entity’s mission/purpose. The Applicant must also indicate the source document (e.g., governance document such as the bylaws or similar, organizing document, such as articles of incorporation, etc.).</p> <p>Do not paraphrase the mission statement.</p> <p>For information on the type of language that indicates a community development mission/purpose, see the <a href="#">Primary Mission</a> section of this guidance manual. Community development does not need to be the primary mission of the non-Affiliated third-party community development, mission-driven entity where the board member is employed, but it must at least be a clear part of its mission/purpose.</p> <p>By staff member of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes).</p>			
Field	AMIS	Field Type	Narrative
Field Label/Question Text	<b>Other Targeted Population Accountability</b> – staff member of non-Affiliated third-party, community development mission-driven entity that primarily serves people with disabilities in the U.S. or its territories – description of how the board member’s place of employment allows him/her to primarily serve people with disabilities		
Response	Provide description		
<b>Response Instruction(s)</b>			
<p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>Provide a clear and detailed explanation of how the non-Affiliated, third-party, community development mission-driven entity where the board member is employed primarily serves people with disabilities within the United States, its territories, and/or the District of Columbia. The explanation should include data resulting from the assessment, and identify the area served by the relevant entity, as well as the factors and information considered.</p>			

By “staff member of a non-Affiliated, third-party, community development mission-driven organization,” the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes).

“Primarily serving” means at least 51% of the entity’s activity is directed in the needed way.

By “community development mission-driven entity,” the CDFI Fund means an entity that has a community development mission or purpose.

By “in the U.S. or its territories,” the CDFI Fund means within the United States, its territories, and/or the District of Columbia.

By “people with disabilities,” the CDFI Fund means people with disabilities in the United States, its territories, and/or the District of Columbia.

By “description of how the board member’s place of employment allows the board member to primarily serve people with disabilities,” the CDFI Fund means a description of how the determination was made that the employer primarily serves people with disabilities within the United States, its territories, and/or the District of Columbia, which includes identifying the area served by the relevant entity, as well as exactly what factors and information were taken into consideration to make the determination and presenting the data resulting from the assessment.

The non-Affiliated third-party community development, mission-driven entity where the board member is employed must not be Affiliated with either the Applicant or, if another entity’s board information is being provided, with that other entity.

The non-Affiliated, third-party, community development mission-driven entity where the board member is employed does not have to be a nonprofit, but it must have a community development mission or purpose.

The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must be focused on serving people within the United States, its territories,

and/or the District of Columbia, otherwise it will not be able to meet the requirement that it primarily serves people with disabilities within that particular geographic area.

For a non-Affiliated, third-party, community development, mission-driven entity where a board member is employed to be accepted as primarily serving people with disabilities within the United States, its territories, and/or the District of Columbia, that entity *must as a whole* (not just a specific program or department or employee, but the entity overall) focus at least 51% of its operations on people with disabilities within the United States, its territories, and/or the District of Columbia.

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

The Applicant must provide a clear and detailed explanation of the process the Applicant used to determine that the non-Affiliated, third-party, community development mission-driven entity where the board member is employed primarily serves people with disabilities within the United States, its territories, and/or the District of Columbia. The explanation should identify the area served by the relevant entity, as well as exactly what factors and information were taken into consideration to make the determination and includes the data resulting from the assessment.

The Applicant must articulate the following in narrative regarding the non-Affiliated, third-party, community development mission-driven entity where the board member is employed:

- The entity as a whole (not just a specific program or department or employee, but the entity overall) focuses at least 51% of its operations on people with disabilities within the United States, its territories, and/or the District of Columbia.
- The entity is focused specifically on serving people with disabilities in the United States, its territories, and/or the District of Columbia. Showing that the entity serves areas identified as economically distressed will not be accepted as an equivalent.

Please note the following:

- “Primarily serving” means at least 51% of the entity’s activity is directed toward that purpose.
- “Community development mission-driven entity” is one with a community development mission or purpose as indicated by the third-party entity mission.
- A “staff member of a non-Affiliated, third-party, community development mission-driven organization,” refers to a paid, direct employee of such an entity for payroll purposes.
- The phrase “description of how the board member's employment allows them to primarily serve residents of qualified census tract(s) in the IA geography,” means explaining how the employer primarily serves residents of qualified census tract(s) in the Investment Area geography. This includes identifying the area served and the factors considered in the determination along with supporting data.
- All areas served by third-party entity, including international activity, must be identified in the narrative as this affects whether the entity is considered to primarily serve residents of qualified census tracts in the relevant IA.

- The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must not be affiliated with the Applicant or any other organization affiliated with the entity.
- The non-Affiliated, third-party, community development mission-driven entity where the board member is employed does not have to be a nonprofit but must have a community development mission or purpose.
- The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must focused on serving people within the United States, its territories, and/or the District of Columbia in order to meet the requirement that it primarily serve residents of a qualified census tract(s) within the Investment Area geography.

Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p><u>If source of Other Targeted Population Accountability is family member of a person with a disability that lives/is employed in the U.S. or its territories:</u>  <b>Other Targeted Population Accountability</b> – family member of a person with a disability that lives/is employed in the U.S. or its territories - relationship of the board member to the person with a disability</p>		
Response	<p>Select one:</p> <ul style="list-style-type: none"> <li>• Spouse</li> </ul>		

	<ul style="list-style-type: none"> <li>• Parent</li> <li>• Child</li> <li>• Sibling</li> <li>• Aunt or Uncle</li> <li>• Grandparent</li> <li>• Stepparent</li> <li>• Stepchild</li> <li>• Stepsibling</li> <li>• In-law parent</li> <li>• In-law sibling</li> </ul>
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**Response Instruction(s)**

**[CLARIFYING UPDATE 07/05/2025]**

Select the appropriate response(s) to identify the relationship the board member has to a person with a disability.

By “in the U.S. or its territories,” the CDFI Fund means within the United States, its territories, and/or the District of Columbia.

By “family member of a person with a disability,” the CDFI Fund means someone who is a family member of a person with a disability and who resides in the United States, its territories, or the District of Columbia.

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

***Repeat source of Accountability data entry for each board member that is being presented as accountable from each board being used as a means of Accountability.***

## 5.10. Non-Government Entity

### Non-Government Entity Requirements

To meet the CDFI Certification Non-Government Entity requirements, an entity may not be an agency or instrumentality of the United States government, or of any State or political subdivision therein. An entity that is created by or formed in partnership with a government or government-Controlled entity or receives substantial assistance from a government entity may be a CDFI, provided it is not Controlled by such entities and maintains independent decision-making authority over its activities.

An entity that is Controlled by a tribal government (includes both federally and State recognized tribal governments), but not by a governmental body of the United States or any of its political subdivisions is eligible for CDFI Certification. Indian tribes are not governmental bodies nor agencies or instrumentalities of the United States or any of its political subdivisions.

### Transition Away from Government Control

If a CDFI Certification Applicant was previously Controlled by a government or government-Controlled entity, it can demonstrate that it has become a non-government entity if its governing leadership-approved governance and organizing documents demonstrate that the following conditions have been met for at least one year.

- No government or government-Controlled entity has a Controlling ownership interest in the Applicant by being one of its owners, members, or partners or, if the Applicant issues stock, by owning or having the power to vote 25% or more of the voting stock shares.
- No branch of government or government-Controlled entity and no officials or employees of any such body/entity have the authority to occupy or select who will occupy either the majority or a substantial minority of the Applicant’s governing leadership positions (e.g., governing/managing board members, managing member, managing partner, and so on).
- The Applicant’s governing leadership does not consist of a majority or substantial minority of officials or employees of a particular branch of government or government-Controlled entity.

<b>NOTE</b>	<p>A substantial minority of the governing leadership is less than half of the number of the governing leaders, but still enough to be able to influence or impact how the governing leadership functions or the decisions it makes. The number of governing leaders that constitutes a substantial minority depends on the governance parameters stated in the entity’s governance document, including the number of governing leaders, how the governing leadership is structured and how it operates. The CDFI Fund looks at whether a substantial minority of an entity’s governing leadership being government-Controlled constitutes government Control of the entity overall on a case-by-case basis as situations vary. For entities applying for CDFI Certification, if there is any question about whether a substantial minority of the governing leadership being government-Controlled constitutes government Control of the entity overall, contact the CDFI Fund before submitting the CDFI Certification Application. The CDFI Fund will provide a preliminary assessment of the situation.</p>
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**Completing the CDFI Certification Application Non-Government Entity Section**

To complete the Non-Government Entity section of the CDFI Certification Application, an Applicant will:

- Review and, if needed, provide, or correct any information intended to be auto populated into the CDFI Certification Application Non-Government Entity section fields.
- Complete the non-auto populated Non-Government Entity section field(s).
- Attach copies of all required documentation.

<b>NOTE</b>	CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.
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**5.10.1. Non-Government Entity – (NGE) Data Fields**

Field	NGE01	Field Type	Picklist
Field Label/Question Text	Was the Applicant previously Controlled by a government entity or government-Controlled entity?		
Response	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant was previously Controlled by a government entity or government-Controlled entity.			
Field	NGE01.1	Field Type	Picklist
Field Label/Question Text	<b>If “Yes,”</b> can the Applicant demonstrate that it has been more than 12 months since it transitioned from government control?		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p><b>If “Yes,”</b> to question NG01, select the appropriate response to indicate whether the Applicant demonstrate that it has been more than 12 months since it transitioned from government control.</p> <p><b>If “No,”</b> the Applicant is not eligible for CDFI Certification.</p>			

<b>Field</b>	<b>NGE01.2</b>	<b>Field Type</b>	Attachment
<b>Field Label/Question Text</b>	Attach copy of document(s) that clearly evidences that the Applicant is no longer Controlled by a government entity or government-Controlled entity.		
<b>Response</b>	Attach document		
<b>Response Instruction(s)</b>			
<p>If <b>“Yes,”</b> to question NGE01.1, attach a copy of document(s) that clearly provides evidence that the Applicant is no longer Controlled by a government entity or government-Controlled entity for at least 12 months from the date the Application was submitted.</p> <div style="border: 1px solid black; padding: 5px; background-color: #fff9c4;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div>			
<b>Field</b>	<b>NGE02</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Do one or more government entities or officials Control the election or appointment of a majority of the members of the Applicant’s governing board or Control a substantial minority of such members?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to indicate whether government entities or officials Control the election or appointment of a majority of the members of the Applicant’s governing board or Control a substantial minority of such members.</p> <p>A substantial minority of a board is less than half of the number of board members, but still enough to be able to influence or impact how the board functions or the decisions it makes. The number of board members that constitutes a substantial minority depends on the board parameters, as stated in the Applicant’s bylaws, including its size, how it is structured and how it operates.</p>			
<b>Field</b>	<b>NGE02.1</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	If <b>“Yes,”</b> explain how this circumstance is not evidence of government Control.		
<b>Response</b>	Provide narrative		

Response Instruction(s)			
If “Yes,” to question NGE02, explain how this circumstance is not evidence of government Control.			
Field	NGE03	Field Type	Picklist
Field Label/Question Text	Does a government or government-Controlled entity have a Controlling ownership interest in the Applicant as one of its owners, members, or partners or, if the Applicant issues stock, by owning or having the power to vote 25% or more of the voting stock shares?		
Response	Yes or No		
Response Instruction(s)			
Select the appropriate response to indicate whether a government or government-Controlled entity have a Controlling ownership interest in the Applicant as one of its owners, members, or partners or, if the Applicant issues stock, by owning or having the power to vote 25% or more of the voting stock shares.			
Field	NGE03.1	Field Type	Narrative
Field Label/Question Text	If “Yes,” explain how this circumstance is not evidence of government Control.		
Response	Provide explanation.		
Response Instruction(s)			
If “Yes,” to question NG03, explain how this circumstance is not evidence of government Control.			
Field	NGE04	Field Type	
Field Label/Question Text	Does the Applicant’s governing board contain members that are government officials (elected, appointed, employees, etc.)?		
Response	Yes or No		
Response Instruction(s)			
Select the appropriate response to indicate whether the Applicant’s governing board contain members that are government officials.			
<i>If “Yes,” respond to questions NGE04.1 and NGE04.1a through NGE04.1b</i>			

<b>Field</b>	<b>NGE04.1</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Identify the governing board members that are government officials		
<b>Response</b>	Enter board member name		
<b>Response Instruction(s)</b>			
Enter the name of the governing board member(s) that are government officials.			
<b>Field</b>	<b>NGE04.1a</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Identify the government agency		
<b>Response</b>	Enter name of government agency		
<b>Response Instruction(s)</b>			
Enter the name of the government agency the governing board member is officially connected to.			
<b>Field</b>	<b>NGE04.1b</b>	<b>Field Type</b>	Text
<b>Field Label/Question Text</b>	Identify the board member’s title and role with the government agency		
<b>Response</b>	Enter title and role		
<b>Response Instruction(s)</b>			
Enter the board member’s position title and describe their role with the government agency in which they are officially connected.			
<b>Field</b>	<b>NGE04.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does a majority or substantial minority of the Applicant’s board of directors consist of government officials (elected, appointed, employees, etc.)?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether a majority or substantial minority of the Applicant’s board of directors consists of government officials.			

A substantial minority of a board is less than half of the number of board members, but still enough to be able to influence or impact how the board functions and/or the decisions it makes. The number of board members that constitutes a substantial minority depends on the board parameters, as stated in the Applicant’s bylaws, including its size, how it is structured and how it operates.			
<b>Field</b>	<b>NGE04.2a</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	If “Yes,” explain how this circumstance is not evidence of government Control.		
<b>Response</b>	Provide explanation		
<b>Response Instruction(s)</b>			
If “Yes,” to question NGE04.2, explain how this circumstance does not evidence government Control.			
<b>Field</b>	<b>NGE04.3</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does the Applicant’s organizing/establishing documents or bylaws require that a certain number of the Applicant’s governing board be government employees or elected/appointed government officials?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the Applicant’s organizing/establishing documents or bylaws require that a certain number of the Applicant’s governing board be government employees or elected/appointed government officials.			
<b>Field</b>	<b>NGE04.3a</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	If “Yes,” explain how this circumstance does not constitute government Control.		
<b>Response</b>	Provide explanation		
<b>Response Instruction(s)</b>			
If “Yes,” to question NGE04.3, explain how this circumstance does not constitute government Control.			

<b>Field</b>	<b>NGE05</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Do one or more government entities have veto power over the selection of the Applicant’s executive director, CEO, or comparable officer, or over specific investment decisions?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether one or more government entities have veto power over the selection of the Applicant’s executive director, CEO, or comparable officer, or over specific investment decisions.			
<b>Field</b>	<b>NGE05.1</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	<b>If “Yes,”</b> explain how this circumstance does not constitute government Control.		
<b>Response</b>	Provide explanation		
<b>Response Instruction(s)</b>			
<b>If “Yes,”</b> to question NG05, explain how this circumstance does not constitute government Control.			
<b>Field</b>	<b>NGE06</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does any government entity provide more than 50% of the Applicant’s operating and/or capital budget?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether any government entity provides more than 50% of the Applicant’s operating and/or capital budget.			
<i>If “Yes,” respond to questions NGE06.1 through NGE06.4.</i>			
<b>Field</b>	<b>NGE06.1</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Explain how this circumstance does not constitute government Control.		

<b>Response</b>	Provide explanation		
<b>Response Instruction(s)</b>			
Explain how this circumstance does not constitute government control.			
<b>Field</b>	<b>NGE06.2</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does that government entity have the ability to control the use of those funds?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether that government entity has the ability to control the use of those funds.			
<b>Field</b>	<b>NGE06.3</b>	<b>Field Type</b>	Attachment
<b>Field Label/Question Text</b>	Attach a copy of the contract or grant agreement(s) for any government entity that provides operating and/or capital funds to the Applicant.		
<b>Response</b>	Attachment(s)		
<b>Response Instruction(s)</b>			
Attach a copy of the contract or grant agreement(s) for any government entity that provides operating and/or capital funds to the Applicant.			
<div style="border: 1px solid black; padding: 5px;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div>			
<b>Field</b>	<b>NGE06.4</b>	<b>Field Type</b>	Numeric
<b>Field Label/Question Text</b>	Provide the page number of the document that provides confirmation.		
<b>Response</b>	Enter page number(s)		
<b>Response Instruction(s)</b>			
Direct the CDFI Fund to the exact page number(s) from the attached document(s) that provides evidence that the government entity provides operating and/or capital funds to the Applicant.			

<b>Field</b>	<b>NGE07</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does any government entity manage any aspect of the Applicant’s operations?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether any government entity manages any aspect of the Applicant’s operations.			
<b>Field</b>	<b>NGE07.1</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	If “Yes,” explain how this circumstance does not constitute government Control.		
<b>Response</b>	Provide explanation		
<b>Response Instruction(s)</b>			
If “Yes,” to question NGE07, explain how this circumstance does not constitute government Control.			
<b>Field</b>	<b>NGE08</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Are any of the employees of the Applicant government employees or employees of an organization Controlled by one or more government entities?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether any of the employees of the Applicant government employees or employees of an organization Controlled by one or more government entities.			
<b>Field</b>	<b>NGE08.1</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	If “Yes,” explain how this circumstance does not constitute government Control.		
<b>Response</b>	Provide explanation		
<b>Response Instruction(s)</b>			
If “Yes,” to question NGE08, explain how this circumstance does not constitute government control.			

<b>Field</b>	<b>NGE09</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	If the Applicant is Controlled by another entity, is that entity Controlled by one or more government entities?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether the entity that Controls the Applicant is Controlled by one or more government entities.			
<b>Field</b>	<b>NGE09.1</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	If <b>“Yes,”</b> explain how this circumstance does not constitute government control of the Applicant.		
<b>Response</b>	Provide explanation		
<b>Response Instruction(s)</b>			
If <b>“Yes,”</b> to question NGE09, explain how this circumstance does not constitute government Control of the Applicant.			
<b>Field</b>	<b>NGE10</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	Does 50% or more of the Applicant’s funding to support programs or activities developed by a government entity and implemented by the Applicant on behalf of that government entity come from a single government entity?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response to indicate whether 50% or more of the Applicant’s funding to support programs or activities developed by a government entity and implemented by the Applicant on behalf of that government entity come from a single government entity.			
<b><i>If “Yes,” respond to questions NGE10.1 through NGE10.3.</i></b>			
<b>Field</b>	<b>NGE10.1</b>	<b>Field Type</b>	Narrative
<b>Field Label/Question Text</b>	Explain how this funding does not constitute government control.		
<b>Response</b>	Provide explanation		

Response Instruction(s)			
Explain how this funding does not constitute government control.			
Field	NGE10.2	Field Type	Attachment
Field Label/Question Text	Attach a copy of contract(s)		
Response	Attachment(s)		
Response Instruction(s)			
Attach a copy of contract(s).			
<div style="border: 1px solid black; padding: 5px;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div>			
Field	NGE10.3	Field Type	Numeric
Field Label/Question Text	Provide the page number of the document that provides confirmation.		
Response	Enter Page Number(s).		
Response Instruction(s)			
Direct the CDFI Fund to the exact page number(s), from the attached document(s), with the relevant information.			

## 5.11. Native American CDFI Designation

### **Native American CDFI Designation Requirements**

To obtain and maintain the Native American CDFI designation, an entity must:

- Meet all relevant requirements to be a Certified CDFI;
- Primarily serve a Native Community(ies), as evidenced by at least 50% of its eligible Financial Products activity (in both number and dollar volume) being directed to a Native Community(ies) market consisting of one or more Native Communities; and
- Demonstrate accountability to a Native Community(ies) (can include a Native Community(ies) not currently served via eligible Financial Products activity).

<b>NOTE</b>	<p>Compliance with the Native Community(ies) activity benchmark requirements for the Native American CDFI designation is determined based on eligible Financial Products activity alone. Other activity, including eligible Financial Services, is not considered.</p> <p>The statutorily required CDFI Certification collective review for DIHC(s), Affiliates of DIHC(s), and Subsidiaries of IDI(s), required for the general CDFI Certification, does not apply to the Native American CDFI designation. However, DIHC(s) that do not directly engage in any eligible Financial Products or eligible Financial Services activity may rely on the activity of an entity relevant to its collective review process to meet the Native American CDFI designation requirement.</p>
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To maintain the Native American CDFI designation, entities must meet general CDFI Certification requirements and demonstrate compliance with both the Native Community(ies) market eligible Financial Products activity benchmarks each fiscal year, and the Native American CDFI designation Accountability requirements. The Native American CDFI designation cannot be maintained independent of CDFI Certification. If an entity is not CDFI Certified, it is ineligible to have the Native American CDFI designation.

<b>NOTE</b>	<p>Failure to meet the requirements for the Native American CDFI designation will not, on its own, adversely affect an entity’s CDFI Certification status.</p>
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An entity with Native American CDFI designation that fails to meet the Native Community(ies) market benchmarks based on its eligible Financial Products activity over its most recently completed fiscal year may maintain its Native American CDFI designation. To do this, the entity will need to demonstrate that it met the benchmarks over a three-year period through the last day of its most recently completed fiscal year (or over two full fiscal years for an entity that has been a Certified CDFI under the CDFI Certification policies that went into effect in December 2023 for less than two years) – as measured by data submitted in its three most recent TLR(s), including the TLR submitted as part of its CDFI Certification Application, if necessary.

A Native American CDFI that still falls below the Native American CDFI Native Community(ies) market eligible Financial Products activity benchmarks over three full fiscal years of financing activity in their TLR

(or over two full fiscal years for those that have been Certified CDFIs under the CDFI Certification policies that went into effect in December 2023 for less than two years) will lose the Native American CDFI designation.

### **Native Communities**

Native Communities include the following populations: Native American/American Indian, Native Alaskan, and Native Hawaiian; and the following geographies: Native American areas defined as federally designated reservations, Hawaiian homelands, Alaska Native Villages, or U.S. Census Bureau-designated Tribal Statistical Areas.

### **Native American CDFI Designation Market Record Activity**

To obtain the Native American CDFI designation, an entity must create a new Native American CDFI Native Community(ies) market record in the CDFI Certification market section of its AMIS account. The market record will represent the entity's Native American CDFI Native Community(ies) market data on the level of eligible Financial Products activity the Applicant directs to a Native Community market(s) and should be collected in the TLR. The data must include all eligible Financial Products transactions that were closed by the Applicant during its most recently completed full 12-month fiscal year. Transactions directed to a Native Community market(s) must be identified in the TLR in order to count toward the 50% requirement for the Native American CDFI designation.

### **Native American CDFI Designation Accountability Requirements**

Entities applying for the Native American CDFI designation must create and complete the same Accountability- related board member records as those completed for general CDFI Certification. Instructions on how to complete board and board member records can be found in the Accountability section of this guidance manual. For the CDFI Certification Accountable Member record(s) that need to be created and completed to demonstrate accountability in connection with the Native American CDFI designation, see below.

#### **NOTE**

The field labels that display in an actual board record, board member record, and accountable board member record (vs. the field labels/questions that appear in the pop-up window where the board, board member, and accountable board member data is entered) may not accurately reflect the information that has been or should be provided in that field. Please make sure to hover over the "i" in the black circle for more information on how the field should be completed.

### **Native American CDFI Designation – Board Standards**

See information in the [Accountability Board Standards](#) section of this guidance manual.

### **Native American CDFI Designation – Methods of Accountability**

#### **Option 1: Governing Board Only**

- At least 33% of the governing board is accountable to Native Community(ies); ***and***
- At least 50% of such representative board members are members of a Native Community population(s).

**Option 2: Governing Board Supplemented by Advisory Board**

- At least 60% of an advisory board is accountable to a Native Community(ies);
- At least 50% of such representative board members are members of a Native Community population(s);
- At least 20% of the governing board is accountable to a Native Community(ies);
- At least one governing board member is also a member of the advisory board; **and**
- The Applicant has adopted an advisory board policy.

**Option 3: Advisory Board Supplemented by Credit Union Membership (Credit Union Applicant Only)**

- At least 33% of the credit union's members are determined to be members of a Native Community(ies), using a CDFI Fund-approved CDFI Certification Target Market Assessment Methodology;
- At least 60% of the advisory board are accountable to a Native Community(ies);
- At least 50% of such representative board members are members of a Native Community population(s);
- At least one governing board member is also a member of the advisory board; **and**
- The Applicant has adopted an advisory board policy.

**Option 4: Advisory Board Only (DIHC[s], IDI[s], and entities without a formal governing board only)**

- At least 80% of the advisory board is accountable to a Native Community(ies);
- At least 50% of such representative board members are members of a Native Community population(s);
- At least one governing leadership of the Applicant entity is also a member of the advisory board; **and**
- The Applicant has adopted an advisory board policy.

**Native American CDFI Designation – Sources of Accountability**

The individual accountability of board members to a Native Community(ies) may be demonstrated through any of the following sources:

- Membership in a Native Community population;
- Primary residence in a Native Community geography;
- Status as a small business owner, where the business is primarily located in a Native Community geography(ies);
- Status as a small business owner that principally employs or principally provides goods or services to residents of a Native Community geography(ies);
- Status as an elected tribal government official serving a Native Community; **or**

- Status as a paid direct employee of a non-Affiliated, third-party, community development mission-driven organization that primarily provides services to members of a Native Community population(s) or residents of Native Community geography(ies).

**Completing the CDFI Certification Application Native American CDFI Designation Section**

To complete the Native American CDFI designation section of the CDFI Certification Application, an Applicant must complete, if applicable, all of the following steps:

- create a new Native American CDFI Native Community(ies) market record in the CDFI Certification Market section of its AMIS account to represent its Native American CDFI Native Community(ies) market;
- create or review and, if needed, update its advisory board policy, if the Applicant will use an advisory board to demonstrate accountability to its Native American CDFI Native Community(ies) market;
- create or review and, if needed, update a board member recusal policy for itself, as applicable, in connection with the board(s) being used to demonstrate accountability to its Native American CDFI Native Community(ies) market;
- create the related CIMS map(s) in AMIS if any member of the board(s) the Applicant will use as a means of Accountability in connection with the Native American CDFI designation is being presented as accountable via a source(s) of Accountability requiring a CIMS map to demonstrate its validity;
- create board, board member and accountable board member records in AMIS to present Accountability information in connection with the Native American CDFI designation;
- review and, if needed, provide or correct any information intended to be auto populated into the CDFI Certification Application Native American CDFI designation section fields;
- complete the non-auto populated Native American CDFI designation section field(s); ***and***
- attach copies of all required documentation in the board, board member, and accountable board member records.

<b>NOTE</b>	CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.
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	<p><b>[CLARIFYING UPDATE 07/05/2025]</b></p> <p>Native Community(ies) Market Record</p> <p>The Applicant must create a new Native American CDFI Native Community(ies) market record in the CDFI Certification market section of its AMIS account when preparing its CDFI Certification Application to represent its Native American CDFI designation-related Native Community(ies) market.</p>
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The Native American CDFI designation-related Native Community(ies) market record must be separate and distinct from any market record(s) representing a component in the Applicant’s CDFI Certification Target Market for general CDFI Certification purposes (i.e., a market record that represents a component in the general CDFI Certification Target Market cannot be used to represent the Native American CDFI designation market), even if there is overlap between the two markets because a component(s) in the CDFI Certification Target Market is also recognized as a Native Community market.

Pre-existing market records in an entity’s AMIS account (including those that are in an approved, rejected, or previously approved/historical status) cannot be used to represent the Native American CDFI designation market for CDFI Certification Application purposes.

### 5.11.1. Native American CDFI Designation – General

#### Native American CDFI Designation – General – (NA) Data Fields

<b>Field</b>	<b>NA01</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	Does the Applicant want to be designated as a Native American CDFI?		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
Select the appropriate response that indicates whether the Applicant wants to be designated as a Native American CDFI. <b>If “No,”</b> no further information is needed in this section.			
<b>Field</b>	<b>NA02</b>	<b>Field Type</b>	<b>Picklist</b>
<b>Field Label/Question Text</b>	If the Applicant provided Financial Products to any Native Community(ies) during the immediate 12 full months completed prior to submission of the CDFI Certification Application, identify the Native Community(ies) that received the Financial Products and/or the depository accounts.		
<b>Response</b>	Select all that apply: <ul style="list-style-type: none"> <li>• Native American.</li> <li>• Native Alaskan.</li> <li>• Native Hawaiian.</li> <li>• Native American areas defined as federally designated reservation(s).</li> <li>• Hawaiian homeland(s).</li> <li>• Alaska Native Village(s).</li> <li>• U.S. Census Bureau-designated Tribal Statistical Area(s).</li> </ul>		

Response Instruction(s)
<p>If <b>“Yes,”</b> to question NA01, select the appropriate response(s) to identify the Native Community(ies) to which the Applicant directed eligible Financial Products activity during its most recently completed full 12 month fiscal year.</p> <p>The response should only reflect the status for the Applicant’s eligible Financial Products activity, not the eligible Financial Products and/or eligible Financial Services activity as indicated by the field label/question.</p> <p>The response should reflect the Applicant’s status for its most recently completed full 12 month fiscal year, not eligible Financial Products activity closed during the last 12 full calendar months as indicated by the field label/question.</p>

### 5.11.2. Native American CDFI Designation – Activity Directed to Native Community(ies)

This subsection will be visible **only if NA01 is “Yes”**.

NATIVE AMERICAN CDFI DESIGNATION – ACTIVITY DIRECTED TO NATIVE COMMUNITIES <i>(Simulated Table – actual display in AMIS may differ)</i>				
	Percent of Native Communities Financial Products – Number	Native Communities threshold met?	Percent of Native Communities Financial Products – Dollar volume	Native Communities threshold met?
<b>Total Financial Products</b>	[Auto populated]	[Auto display – Yes or No]	[Auto populated]	[Auto-display – Yes or No]
	Percent of Native Communities Financial Products – Number	Native Communities threshold met?	Percent of Native Communities Financial Products – Dollar volume	Native Communities threshold met?

### 5.11.3. Native American CDFI Designation – Activity Directed to Native Community(ies) – (NA-NC) Data Fields

This subsection will be visible **only if NA01 is “Yes”**.

Field	NA-NC01	Field Type	Picklist
Field Label/Question Text	Is the Applicant a DIHC that does not engage in its own direct Financial Product or Financial Service activity and is relying on its Affiliates to meet the CDFI Certification Financing Entity or Target Market requirements?		

<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Reflects whether the Applicant is a DIHC that does not engage in its own direct eligible Financial Products activity and is relying on all entities relevant to its CDFI Certification collective review process that do engage in such activity to meet the Native Community(ies) market benchmarks for the Native American CDFI designation.</p> <p>The response should reflect whether the DIHC Applicant engages in eligible Financial Products activity alone, rather than whether the DIHC Applicant engages in eligible Financial Products or eligible Financial Services activity as the field label/question for this field indicates.</p>			
<b>Field</b>	<b>NA-NC01.1</b>	<b>Field Type</b>	Look-Up
<b>Field Label/Question Text</b>	<p>If <b>“Yes”</b> to NA-NC01: identify all Affiliate(s) that are required to be presented for review in connection with the CDFI Certification.</p>		
<b>Response</b>	Select relevant Affiliates from Affiliates record		
<b>Response Instruction(s)</b>			
<p>Select entity name(s).</p> <p>Each related entity relevant to the DIHC Applicant’s CDFI Certification collective review process should be selected.</p>			
<b>Field</b>	<b>NA-NC02</b>	<b>Field Type</b>	Picklist
<b>Field Label/Question Text</b>	<p><u>Native Communities assessment methodology attestation – Financial Products:</u></p> <p>Applicant attests that Financial Product transactions counted have and will continue to be directed to Native Communities using the assessment methodology(ies) that was pre-approved by the CDFI Fund.</p>		
<b>Response</b>	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to confirm whether the Applicant has complied with and will continue to comply with the CDFI Fund-approved CDFI Certification Target Market Assessment Methodology(ies) used to determine whether eligible Financial Products activity has been directed to the relevant population(s) for each Native Community population it serves. Additionally, the response should confirm whether the Applicant has applied and will continue to apply processes consistent with the CDFI Fund-approved Target Market Assessment Methodology(ies) for an Investment Area where status related to Native Community geographies is verified instead of statuses related to a</p>			

“qualified census tract or an eligible customized Investment Area (CIA) or non-Metro county or parish Investment Area)”, for each Native Community geography the Applicant serves with its eligible Financial Products activity.

Refer to the [Pre-Approved CDFI Certification Target Market Assessment Methodologies](#)

For a Non-Certified CDFI Applicant, the attestation in NA-NC02 must signify that all of the Native Community activity reported in its TLR was assessed using one or more of the approved methodologies that it identifies in its response to NA-NC03.

Currently Certified CDFIs that have been using a Target Market Assessment Methodology other than one that appears on the list of pre-approved methodologies may use the grace period until their application submission deadlines either to request approval of that methodology or to adopt one or more of the pre-approved methodologies. For such a currently Certified CDFI, the attestation in

NA-NC02 must signify that the CDFI has begun using – and will continue to use – only one or more of the approved Target Market assessment methodologies that it identifies in its response to NA-NC03 by the time it submits its application for CDFI Certification under the revised standards.

Field	NA-NC03	Field Type	Picklist
Field Label/Question Text	Identify the assessment methodology(ies) used by the Applicant.		
Response	Select all that apply: <ul style="list-style-type: none"> <li>OTP-Native American.1: Self-Report.</li> <li>OTP-Native American. 2: Tribal Identification Verification.</li> <li>OTP-Native Alaskan.1: Self-Report.</li> <li>OTP-Native Alaskan.2: Tribal Identification Verification.</li> <li>OTP-Native Hawaiian.1: Self-Report.</li> <li>OTP-Native Hawaiian.2: Origins Identification Verification.</li> <li>Separately approved assessment methodology.</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response(s) that identifies the pre-approved CDFI Certification Target Market Assessment Methodology(ies) used to determine whether eligible Financial Products activity was directed to a Native Community for the purposes of presenting market activity data for this Application or that will be used in connection with the Native Community market(s) moving forward. If the Applicant <b>serves a Native Community geography(ies)</b> , select “Separately approved assessment methodology” and enter Native Community geography in the related text box. Review the CDFI Certification guidance on <a href="#">Pre-Approved CDFI Certification Target Market Assessment Methodologies</a> for information on the specifics of the allowed Target Market Assessment Methods.			
<b>NA-NC03.1</b> <i>If “Separately approved assessment methodology”:</i>			

Field	NA-NC03.1	Field Type	Narrative
Field Label/Question Text	Identify the assessment methodology(ies) approved by the CDFI Fund.		
Response	Provide narrative		
Enter the name of the Target Market Assessment Methodology(ies) that was separately approved by the CDFI Fund and does not currently display in the picklist. If the Applicant serves a Native Community geography(ies), enter Investment Area/Native Community geography.			
Response Instruction(s)			
Review the CDFI Certification guidance on Pre-Approved CDFI Certification Market Target Market Assessment Methodologies for information on the specifics of the allowed market assessment methods. The Applicant must convey the eligibility determinations approved by the CDFI Fund via Section Zero.			

### 5.11.4. Native American CDFI Designation – Native Community Accountability

#### Native American CDFI Designation – Accountability

CDFI Certification Applicants seeking the Native American CDFI designation must present Native American CDFI designation-related Accountability information separately from the Accountability information provided in connection with the general CDFI Certification.

The following Native American CDFI Accountability-related field must be completed in the section below. In addition, Native American CDFI designation Accountability-related board, board member, and accountable board member records must be created and completed in the Applicant’s AMIS account.

<b>NOTE</b>	<p>Before an Applicant can complete Accountability fields in the CDFI Certification Application for the purposes of demonstrating its accountability in connection with the Native American CDFI designation, it must:</p> <ul style="list-style-type: none"> <li>Create a new CDFI Certification Market record with the Native Communities market type in the CDFI Certification Market section of their AMIS account to represent its CDFI Native American CDFI designation market; and</li> <li>Create board, board member, and CDFI Certification accountable member records in its AMIS account to present its Accountability information in connection with the Native American CDFI designation.</li> </ul>
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**Native American CDFI Designation – Accountability Field**

Field	AMIS	Field Type	Look-up
Field Label/Question Text	Native American CDFI – board(s) to demonstrate Applicant’s Native American CDFI Accountability		
Response	Select Board Name from AMIS Board Record		
<b>Response Instruction(s)</b>			
<p>Use the look-up function in this field to find and select the board record(s) that will be used to demonstrate accountability to the Applicant’s Native American CDFI designation market in the Applicant’s AMIS account.</p> <p>The board record(s) selected must be a new record(s) created specifically for the CDFI Certification Application and for Native American CDFI designation Accountability in particular. The board record must also reflect the Applicant’s current board information based on an as of date no more than 45 days prior to the submission date of the Application. Submission date is determined by the Eastern time submission time stamp on the Application.</p> <div style="border: 1px solid black; padding: 5px;"> <p><b>NOTE:</b> A board record(s), separate from the board record(s) the Applicant is using for general CDFI Certification, must be created to present Accountability information for the Native American CDFI designation, even if the same board(s) and accountable board member(s) are being used for both purposes.</p> <p>The number of boards used by the Applicant to demonstrate its accountability in connection with the Native American CDFI designation will depend on the method of Accountability it uses but will never exceed two boards (one governing board and one advisory board).</p> <p>Repeat this step if both a governing and an advisory board will be used for Native American CDFI designation Accountability purposes.</p> </div>			

**5.11.5. Native American CDFI Designation – Accountability – Board, Board Member, and Accountable Board Member Records**

**Board, Board Member, and Accountable Board Member Records – Data Field (NA-CA) Data Fields**

The following information addresses how to complete the fields in an accountable board member record to demonstrate accountability for the Native American CDFI designation.

For information on how to complete the Accountability-related fields for the Native American CDFI designation in the CDFI Certification Application or an Accountability-related board or board member record in an entity’s AMIS account, go to the [Native American CDFI Designation – Accountability Field](#) and to the board and board member record information in the [Accountability – Board, Board Member, and Accountable Board Member Records](#) subsections of this guidance manual.

*The following fields will be completed in each of the board member records created within a board record in an entity’s AMIS account.*

*The data entry for the accountable board member records will be repeated for each member of the applicable board.*

**Native American CDFI Designation – (NA-CA) Sources of Accountability Data Field**

Field	AMIS	Field Type	Picklist
Field Label/Question Text	<b>Native American CDFI accountable board member</b> - Native Community type to which the board member is accountable.		
Response	Select one <ul style="list-style-type: none"> <li>• Native American areas defined as federally designated reservation(s)</li> <li>• Hawaiian homeland(s)</li> <li>• Alaska Native Village(s)</li> <li>• U.S. Census Bureau-designated Tribal Statistical Area(s)</li> <li>• Native American</li> <li>• Native Alaskan</li> <li>• Native Hawaiian</li> </ul>		
<b>Response Instruction(s)</b>			
Select the appropriate response to identify a Native Community market type to which the Applicant believes the board member is accountable. A separate accountable board member record/subpage must be created in a board member’s record for each Native Community market type to which the Applicant believes the board member is accountable.			
<i>Questions will be asked <b>only</b> for board members identified as accountable to a Native Community Geography</i>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<b>Native Community(ies) Accountability</b> - source(s) of Native Community(ies) Accountability		
Response	Select all that apply: <ul style="list-style-type: none"> <li>• Member of a Native Community population(s).</li> <li>• Primary residence in a Native Community geography.</li> <li>• Owner of a small business primarily located in a Native Community geography(ies).</li> </ul>		

	<ul style="list-style-type: none"> <li>• Owner of a small business that principally provides goods or services to residents of a Native Community geography(ies).</li> <li>• Owner of a small business that principally employs residents of a Native Community geography(ies).</li> <li>• Elected Tribal Government official.</li> <li>• Staff member of a non-Affiliated third-party, community development mission-driven entity that primarily serves residents of a Native Community geography(ies).</li> </ul>		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response(s) to identify the source(s) of Accountability the relevant board member has to a Native Community population(s) or geography(ies).</p> <p>By staff member of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes).</p> <p>If a non-Affiliated third-party, community development mission-driven entity where a board member is employed primarily serves a Native Community population(s), select the geography(ies).</p> <div style="border: 1px solid black; background-color: #fff9c4; padding: 5px; margin-top: 10px;"> <p><b>Note:</b> Accountable board members must continuously maintain an acceptable source of Accountability, or they can no longer be considered accountable.</p> </div>			
<b>Field</b>	<b>AMIS</b>	<b>Field Type</b>	<b>Numeric</b>
<b>Field Label/Question Text</b>	<p><u>If source of Native Community(ies) Accountability is primary residence in a Native Community geography:</u></p> <p><b>Native Community(ies) Accountability</b> – primary residence in a Native Community geography - FIPS code for the census tract within which the board member resides.</p>		
<b>Response</b>	Enter FIPS code. (Include leading zeros where appropriate)		
<b>Response Instruction(s)</b>			
<p>Enter the Federal Information Processing Standards (FIPS) code for the census tract where the board member resides.</p> <p>To be accountable to a Native Community geography as a resident of a Native Community geography, a board member’s primary place of residence must be within a census tract within a Native American area defined as a federally designated reservation, a Hawaiian homeland, an Alaska Native Village or a U.S. Census Bureau-designated Tribal Statistical Area.</p> <p>The Federal Information Processing Standards (FIPS) code uniquely identifies states and counties and county equivalents and census tracts in the United States, certain U.S. possessions, and certain freely associated states.</p> <p>The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When using the resident of a Native Community geography</p>			

as the source of Accountability, the documentation should include the address of the board member and proof that the location provided is the board member’s primary place of residence. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

*If source of Native Community(ies) Accountability is owner of a small business primarily located in a Native Community geography(ies):*

Field	AMIS	Field Type	Numeric
Field Label/Question Text	<b>Native Community(ies) Accountability</b> – owner of a small business – percentage of the small business owned by the board member		
Response	Enter percentage		

**Response Instruction(s)**

Enter the percentage of the small business owned by the board member.  
 A board member must own at least 25% of a small business to be presented as an owner of that business.  
 If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability. Information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.  
 For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated, is not dominant in its field on a national basis, and meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).

Field	AMIS	Field Type	Text
Field Label/Question Text	<b>Native Community(ies) Accountability</b> – owner of a small business – legal name of the small business owned by the board member		
Response	Enter name		

**Response Instruction(s)**

Enter the legal name of the small business owned by the board member.

<p>If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability. Information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.</p> <p>For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).</p>			
Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p><u>If source of Native Community(ies) Accountability is owner of a small business primarily located in a Native Community geography(ies):</u>  <b>Native Community(ies) Accountability</b> – owner of a small business primarily located in a Native Community geography(ies) – Are at least 51% of all the locations for the owned small business in a census tract(s) in a Native Community geography(ies)?</p>		
Response	Yes or No		
<b>Response Instruction(s)</b>			
<p>Select the appropriate response to identify whether at least 51% of all locations for the small business owned by the board member fall within a Native American area defined as a federally designated reservation, a Hawaiian homeland, an Alaska Native Village, or a U.S. Census Bureau-designated Tribal Statistical Area.</p> <p>If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability. Information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.</p> <p>For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).</p> <p>The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When using an owned small business as a source of Accountability, the documentation should include the name of the business, the type of business, the business locations, proof that the board member is an owner of the business (i.e., that they own at least 25% of the business), and proof that the business qualifies as a small business per CDFI</p>			

Certification standards. The documentation should also include information on how the business meets all other relevant CDFI Certification-related source of Accountability requirements. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

If “No,” the owner of a small business primarily located in a Native Community geography(ies) cannot be used to demonstrate accountability to the Native American CDFI designation market.

Field	AMIS	Field Type	Text
Field Label/Question Text	<p><u>If source of Accountability is owner of a small business primarily located in a Native Community geography(ies) and at least 51% of the locations for the owned small business are in Native Community geography(ies):</u></p> <p><b>Native Community(ies) Accountability</b> – owner of a small business primarily located in a Native Community geography(ies) – map in CIMS that identifies the census tract for each location for the owned small business</p>		
Response	Enter map name		

**Response Instruction(s)**

Enter the name of the CIMS map in AMIS that identifies the census tract(s) for each location of the small business owned by the board member.

The CIMS map should help to substantiate that at least 51% of all locations for the small business owned by the board member fall within a Native American area defined as a federally designated reservation, a Hawaiian homeland, an Alaska Native Village, and/or a U.S. Census Bureau-designated Tribal Statistical Area.

**NOTE:** If multiple locations for the small business owned by the board member fall within a single census tract(s), attach a document in field BI21 in the Basic Information section of the Application that lists any census tract where this occurs and indicates how many of the business locations are in each such census tract.

**Name the attachment: “owned small business Accountability info – Native American CDFI designation”**

If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability and information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.

For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a

small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When using an owned small business as a source of Accountability, the documentation should include the name of the business, the type of business, the business locations, proof that the board member is an owner of the business (i.e., that they own at least 25% of the business), and proof that the business qualifies as a small business per CDFI Certification standards. The documentation should also include information on how the business meets all other relevant CDFI Certification-related source of Accountability requirements. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

Field	AMIS	Field Type	Narrative
<p><b>Field Label/Question Text</b></p>	<p><u>If source of Native Community(ies) Accountability is owner of a small business that principally employs residents of a Native Community geography(ies):</u> Describe how the small business demonstrates that it principally employs residents of a Native Community(ies).</p>		
<p><b>Response</b></p>	<p>Provide narrative</p>		
<p><b>Response Instruction(s)</b></p>			
<p>Provide a clear and detailed explanation of how the small business owned by the board member primarily employs residents of a Native American area defined as a federally designated reservation(s), a Hawaiian homeland(s), an Alaska Native Village(s), and/or a U.S. Census Bureau-designated Tribal Statistical Area(s).</p> <p>A small business owned by a board member must have at least 51% of all employees residing in federally designated Native American areas, including reservation(s), a Hawaiian homeland(s), Alaska Native Village(s), and/or a U.S. Census Bureau-designated Tribal Statistical Area(s) to be accepted as principally employing residents of a qualified census tract(s) in the relevant Investment Area geography.</p> <p>If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability and information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.</p> <p>For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR</p>			

<p>1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).</p> <p>The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When using an owned small business as a source of Accountability, the documentation should include the name of the business, the type of business, the business locations, proof that the board member is an owner of the business (i.e., that they own at least 25% of the business), and proof that the business qualifies as a small business per CDFI Certification standards. The documentation should also include information on how the business meets all other relevant CDFI Certification-related source of Accountability requirements.</p> <p>The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.</p>			
<p>An Applicant will provide a clear and detailed explanation of how the small business owned by the board member primarily employs residents of a Native American area defined as a federally designated reservation(s), a Hawaiian homeland(s), an Alaska Native Village(s), and/or a U.S. Census Bureau-designated Tribal Statistical Area(s).</p> <p>A small business owned by a board member must have at least 51% of all employees residing in federally designated Native American areas, including reservation(s), a Hawaiian homeland(s), Alaska Native Village(s), and/or a U.S. Census Bureau-designated Tribal Statistical Area(s) to be accepted as principally employing residents of a qualified census tract(s) in the relevant Investment Area geography.</p>			
Field	AMIS	Field Type	Text
<b>Field Label/Question Text</b>	<p>If source of Investment Area Accountability is owner of small business that principally provides goods or services to residents of a Native Community geography(ies):</p> <p><b>Investment Area Accountability</b> – owner of a small business that principally provides goods/services to residents of a Native Community geography(ies) – map(s) in CIMS of the overall geography(ies) served by the owned small business.</p>		
<b>Response</b>	Enter map(s) name		
<b>Response Instruction(s)</b>			
<p>Enter the name of the CIMS map(s) in AMIS that identifies the overall geography(ies) served by the small business owned by the board member.</p> <p>Multiple CIMS maps will be needed if the small business owned by the board member serves non-contiguous geographies.</p> <p>All areas served by the small business, including international activity, must be taken into consideration.</p>			

The CIMS map(s) may help to substantiate that the small business owned by the board member primarily serves residents of a Native American area defined as a federally designated reservation(s), a Hawaiian homeland(s), an Alaska Native Village(s), and/or a U.S. Census Bureau-designated Tribal Statistical Area(s).

If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability. Information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.

For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When using an owned small business as a source of Accountability, the documentation should include the name of the business, the type of business, the business locations, proof the board member is an owner of the business (i.e., that they own at least 25% of the business), and proof the business qualifies as a small business per CDFI Certification standards. The documentation should also include information on how the business meets all other relevant CDFI Certification-related source of Accountability requirements. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

Field	AMIS	Field Type	Narrative
<b>Field Label/Question Text</b>	<p><u>If source of Native Community Accountability is owner of small business that principally provides goods/services to residents of a Native Community geography(ies):</u> Describe how the business demonstrates that it principally provides goods and services to residents of a Native Community geography(ies).</p>		
<b>Response</b>	Provide narrative		

**Response Instruction(s)**

The Applicant must provide a clear and detailed explanation of how the small business owned by the board member primarily serves residents of a Native American area defined as a federally designated reservation(s), a Hawaiian homeland(s), an Alaska Native Village(s), and/or a U.S. Census Bureau-designated Tribal Statistical Area(s).

A small business owned by a board member must have at least 51% of all employees residing in federally designated Native American areas, including reservation(s), a Hawaiian homeland(s), Alaska

Native Village(s), and/or a U.S. Census Bureau-designated Tribal Statistical Area(s) to be accepted as principally employing residents of a qualified census tract(s) in the relevant Investment Area geography.

If the board member owns more than one small business, each business must be presented separately as a potential source of Accountability and information used to demonstrate that a board member is accountable to an Investment Area via the small business owner source of Accountability must reflect the status of each owned small business separately and independently. Combined information on more than one owned small business cannot be used to meet the requirements of the related source of Accountability.

For CDFI Certification purposes, a small business is a for-profit entity that is independently owned and operated; that is not dominant in its field on a national basis; and that meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. When using an owned small business as a source of Accountability, the documentation should include the name of the business, the type of business, the business locations, information on how the board member is an owner of the business (i.e., that they own at least 25% of the business), and information on how the business qualifies as a small business per CDFI Certification standards. The documentation should also include information on how the business meets any and all other relevant CDFI Certification-related source of Accountability requirements. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

*If source of Native Community(ies) Accountability is elected Tribal Government official:*

Field	AMIS	Field Type	Text
Field Label/Question Text	<b>Native Community(ies) Accountability</b> – elected tribal government official – elected official’s office and jurisdiction		
Response	Enter office and jurisdiction		

**Response Instruction(s)**

Provide the name of the board member’s elected tribal government office, including the unit of government and the specific jurisdiction they represent in their capacity as an elected official.

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

<p><i>If source of Native Community(ies) Accountability is staff member of a non-Affiliated third-party, community development mission-driven entity that primarily serves residents of a Native Community geography(ies):</i></p>			
Field	AMIS	Field Type	Text
Field Label/Question Text	<p><b>Native Community(ies) Accountability</b> – staff member of a non-Affiliated third-party, community development mission-driven entity that primarily serves residents of a Native Community geography(ies) – description of how the board member’s employment allows them to be connected to the Native Community geography(ies).</p>		
Response	<p>Enter name</p>		
Response Instruction(s)			
<p>Enter the name of the non-Affiliated third-party community development, mission-driven entity where the board member is employed.</p> <p>The non-Affiliated, third-party, community development, mission-driven entity where the board member is employed:</p> <ul style="list-style-type: none"> <li>- must not be Affiliated with either the Applicant or, if another entity’s board information is being provided, with that other entity;</li> <li>- must have a community development mission or purpose, but not does not have to be a non-profit; <b>and</b></li> <li>- must be focused on serving people within the United States, its territories, and/or the District of Columbia.</li> </ul> <p>By staff member of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes). By paid direct employee of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means someone who is considered to be an employee of such an entity for payroll purposes.</p> <p>Per the CDFI Fund, please note the following:</p> <ul style="list-style-type: none"> <li>• “Primarily serving” means at least 51% of the entity’s activity is directed toward that purpose.</li> <li>• “Community development mission-driven entity” is one with a community development mission or purpose as indicated by the third-party entity mission.</li> <li>• By “in the U.S. or its territories,” the CDFI Fund means within the United States, its territories, and/or the District of Columbia.</li> <li>• The non-Affiliated, third-party, community development mission-driven entity where the board member is employed must not be affiliated with the Applicant or any other organization affiliated with the entity.</li> <li>• The non-Affiliated, third-party, community development mission-driven entity where the board member is employed does not have to be a nonprofit but must have a community development mission or purpose.</li> </ul>			

Field	AMIS	Field Type	Text
Field Label/Question Text	<b>Native Community(ies) Accountability</b> – staff member of a non-Affiliated third-party, community development mission-driven entity that primarily serves residents of a Native Community geography(ies) – formal mission statement for non-Affiliated third-party entity		
Response	Enter mission statement		
<b>Response Instruction(s)</b>			
<p>Enter the mission statement for the non-Affiliated third-party community development, mission-driven entity where the board member is employed verbatim as it appears in a binding governing leadership-approved document of record that identifies that entity’s mission/purpose. The Applicant must also indicate the source document, e.g., governance document such as the bylaws or similar, organizing document, such as articles of incorporation, etc.</p> <p>Do not paraphrase the mission statement.</p> <p>For information on the type of language that indicates a community development mission/purpose, see the <a href="#">Primary Mission</a> section of this guidance manual. Community development does not need to be the primary mission of the non-Affiliated third-party community development, mission-driven entity where the board member is employed, but it must at least be a clear part of its mission/purpose.</p> <p>By staff member of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes). By paid direct employee of a non-Affiliated, third-party, community development mission-driven organization, the CDFI Fund means someone who is considered to be an employee of such an entity for payroll purposes.</p>			
Field	AMIS	Field Type	Narrative
Field Label/Question Text	<b>Native Community(ies) Accountability</b> – staff member of a non-Affiliated third-party, community development mission-driven entity that primarily serves residents of a Native Community geography(ies) – description of how the board member’s employment allows them to be connected to the Native Community geography(ies)		
Response	Provide description		
<b>Response Instruction(s)</b>			
<p>Provide a clear and detailed explanation of how the Applicant determined the non-Affiliated, third-party, community development, mission-driven entity where the board member is employed primarily serves either a Native Community geography(ies) or a Native Community population(s) within the United States, its territories, and/or the District of Columbia. The explanation must identify</p>			

the area served by the relevant entity, the factors and information used to make the determination and include the data resulting from the assessment.

By “description of how the board member’s employment allows them to be connected to the Native Community geography(ies),” the CDFI Fund means description of how the employer primarily serves either a Native Community geography(ies) or a Native Community population(s) within the United States, its territories, and/or the District of Columbia, which includes identifying the area served by the relevant entity, and what factors and information were taken into consideration to make the determination and presenting the data resulting from the assessment.

By “staff member of a non-Affiliated, third-party, community development mission-driven organization,” the CDFI Fund means a paid direct employee of such an entity (i.e., someone who is considered to be an employee of such an entity for payroll purposes).

By “paid direct employee of a non-Affiliated, third-party, community development mission-driven organization,” the CDFI Fund means someone who is considered to be an employee of such an entity for payroll purposes.

The non-Affiliated third-party community development, mission-driven entity where the board member is employed must not be Affiliated with either the Applicant or, if another entity’s board information is being provided, with that other entity.

The non-Affiliated, third-party, community development mission-driven entity where the board member is employed does not have to be a nonprofit, but it must have a community development mission or purpose.

The non-Affiliated, third-party, community development, mission-driven entity where the board member is employed must be focused on serving people within the United States, its territories, and/or the District of Columbia.

For a non-Affiliated, third-party, community development mission-driven entity where the board member is employed to be accepted as primarily serving either a Native Community geography(ies) or a Native Community population(s) within the United States, its territories, and/or the District of Columbia, that entity, must as a whole (not just a specific program or department or employee, but the entity overall), focus at least 51% of its operations on either a Native Community geography(ies) or a Native Community population(s) within the United States, its territories, and/or the District of Columbia.

The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.

*Question will be asked **only** for board members identified as accountable to a Native Community Population.*

Field	AMIS	Field Type	Picklist
Field Label/Question Text	<p><u>If source of Native Community(ies) Accountability is member of a Native Community population(s):</u></p>		

	<p><b>Native Community(ies) Accountability</b> – member of a Native Community population(s) – assessment methodology(ies) used to confirm status as a member of a Native Community population(s)</p>
<p><b>Response</b></p>	<p>Select all that apply:</p> <ul style="list-style-type: none"> <li>• OTP-Native American.1: Self Report.</li> <li>• OTP-Native American.2: Tribal Document.</li> <li>• OTP-Native Alaskan.1: Self Report.</li> <li>• OTP-Native Alaskan.2: Tribal Document.</li> <li>• OTP-Native Hawaiian.1: Self Report.</li> <li>• OTP-Native Hawaiian.2: Registry Card.</li> <li>• CDFI Assessment methodology(ies) separately approved by the CDFI Fund</li> </ul>
<p><b>Response Instruction(s)</b></p>	
<p>Select the appropriate response(s) to identify the method used to verify that the board member is a member of the population(s) to which they are being presented as accountable.</p> <p>The only way to demonstrate accountability to a Native Community population is for a board member(s) to be a member of that population.</p> <p>Review the CDFI Certification guidance on Pre-Approved CDFI Certification Market Assessment Methodologies for information on the specifics of the allowed market assessment methods.</p> <p>The Applicant must maintain records that clearly demonstrate that all conditions of the identified source of Accountability have been met. For board members presented as accountable as members of a Native Community population, documentation might include a copy of a form where the board member self-reported their status, copy of a tribal enrollment card, etc. The CDFI Fund may, at its discretion and in accordance with its CDFI Certification-related document retention policy, request documentation, records, and/or other information related to the validity of a source of Accountability at any time within five years after the CDFI Certification Application is submitted, including during the Application review process.</p>	
<p><i><b>Repeat</b> accountable board member data field for each market the board member is being presented as accountable to.</i></p>	

# APPENDICES

[Appendix A: Key Terms](#)

[Key Terms - General](#)

[Key Terms for Identifying Financial Products and Financial](#)

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[Appendix C: CDFI Certification Application Checklist](#)

## APPENDIX A. KEY TERMS USED IN CONNECTION WITH CDFI CERTIFICATION

All capitalized terms in the CDFI Certification materials are defined terms and have specific meanings for CDFI Certification purposes as indicated here, in other CDFI Fund-issued guidance, in the Interim Regulations for the CDFI Program (12 CFR 1805), in the Community Development Banking and Financial Institutions Act of 1994 (12 U.S.C. 4701 et seq.) or in the most recent CDFI Fund Native American CDFI Assistance (NACA) Program Notice of Funds Availability (NOFA).

All lowercase terms listed below are provided to explain the context in which the words are used for the CDFI Certification Application. When used in connection with the CDFI Certification Application the lowercase terms will have the meanings as specified below:

<b>NOTE</b>	For CDFI Certification purposes, banks/thrifts that do not have FDIC deposit insurance and bank/thrift holding companies that are not DIHC(s) are considered to be non-regulated entities.
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### Key Terms – General

Term	Definition
<b>Affiliate</b>	A company or entity that Controls, is Controlled by or operates under common Control with another company.
<b>Allowable</b>	Determined by the CDFI Fund at its sole discretion to have met all relevant requirements.
<b>Arm’s-length (arm’s-length transaction)</b>	Between independent, unrelated parties, each acting in its own best interest.
<b>Binding</b>	Establishes an official commitment or obligation that cannot be disregarded without following a formal process.
<b>Collective Review Market</b>	The market component(s) used by an entity relevant to another entity’s CDFI Certification collective review process for Target Market and Accountability purposes with that other entity’s CDFI Certification.

Term	Definition
<b>Control, Controlled, or Controlling</b>	<ol style="list-style-type: none"> <li>(1) Ownership, control, or power to vote 25% or more of the outstanding shares of any class of voting securities of any company, directly or indirectly or acting through one or more other persons;</li> <li>(2) Control in any manner over the election of a majority of the directors, trustees, general partners, or individuals exercising similar functions of any company; <b><i>or</i></b></li> <li>(3) Power to exercise, directly or indirectly, a Controlling influence over the management, credit, or investment decisions or policies of any company.</li> </ol>
<b>Depository Institution</b>	A bank/thrift, credit union, or bank/thrift holding company.
<b>Depository Institution Holding Company (DIHC)</b>	A bank holding company or a savings and loan holding company, as defined in Section 3 of the Federal Deposit Insurance Act (12 U.S.C. 1813(w)(1)).
<b>Eligible</b>	Of a type that can be presented for consideration and may be allowable if the CDFI Fund, at its sole discretion, determines that all relevant requirements have been met.
<b>Eligible Financial Products Activity/Eligible Financial Products Transaction</b>	Activity/transaction involving an eligible Financial Products type(s) offered at arm's-length. If the CDFI Certification provision for participants in the CDFI Fund's Bond Guarantee Program is being used, then the eligible Financial Products type(s) must be offered to a Certified CDFI that Controls the entity claiming to provide the product. The Certified CDFI's Control must be pursuant to operating agreements that are in a form and substance acceptable to the CDFI Fund and include management and ownership provisions. (see 12 CFR 1805.201(b)(2)(C)(iii)). The entity claiming to provide the product must be named as a financing entity of record in the associated transaction closing documents.
<b>Eligible Financial Services Activity/Eligible Financial Service</b>	Activity involving an eligible Financial Services type(s) offered at arm's-length. If the CDFI Certification provision for participants in the CDFI Fund's Bond Guarantee Program is being used, then the eligible Financial Services type(s) must be offered to a Certified CDFI that Controls the entity claiming to provide the service. The Certified CDFI's Control must be pursuant to operating agreements that are in a form and substance acceptable to the CDFI Fund and include management and ownership provisions. (see 12 CFR 1805.201(b)(2)(C)(iii)). The entity claiming to provide the service must be named as the direct provider of record in relevant documents.

Term	Definition
<b>Governing Board</b>	A board that is integrated into an entity's organizational structure and has the authority to act from its governing leadership, typically identified in its governance document, e.g., its bylaws, operating agreement, or similar document. An entity may refer to the board as something other than a governing board, for example, an advisory board, managing board, etc.
<b>Governing Leadership/Leader</b>	Body, entity(ies), or individual(s) that has the highest decision-making authority for an entity. Examples may include a governing board, advisory board, managing member, managing partner, partner, owner, individual, or special board, to which an entity's decision-making authority has been formally delegated as evidenced in binding documentation. An entity's governing leadership is typically identified in its governance document such as bylaws, operating agreement, or similar document.
<b>Insured Credit Union</b>	Any credit union with member accounts insured by the National Credit Union Share Insurance Fund.
<b>Insured Depository Institution (IDI)</b>	Any bank or thrift with deposits insured by the Federal Deposit Insurance Corporation (FDIC).
<b>National Target Market Geography</b>	Includes all U.S. states and territories and the District of Columbia.
<b>Native Community(ies)</b>	Native American/American Indian, Native Alaskan, and Native Hawaiian; and the following geographies: Native American areas defined as federally designated reservations, Hawaiian homelands, Alaska Native Villages, or U.S. Census Bureau-designated Tribal Statistical Areas.
<b>Native Community(ies) Market</b>	Market used for the Native American CDFI designation that consists of one or more Native Communities.
<b>On-Balance Sheet</b>	Describes items that are recorded on an entity's non-consolidated balance sheet.
<b>On-Balance Sheet Financial Products Activity/Transaction</b>	Activity/transaction involving an eligible Financial Products type(s) for which the entity claiming the activity is named as a financing entity of record in the associated transaction closing documents.
<b>Primary Entity Under Review</b>	The entity seeking to obtain or maintain the CDFI Certification.
<b>Real Property</b>	Also called real estate, is land and generally anything built on or attached to it.

Term	Definition
<b>Small Business</b>	A for-profit entity that is independently owned and operated, is not dominant in its field on a national basis, and meets all other parameters of a small business as defined for Regulation B, issued with the Equal Credit Opportunity Act in 12 CFR 1002.106(b)(1), including that its gross annual revenue for its preceding fiscal year is \$5 million or less, as calculated per 12 CFR 1002.107(a)(14).
<b>Spin-off</b>	An entity that (1) has received a transferred but not purchased Financial Products portfolio that consists of arm’s-length Financial Products transactions closed by the Affiliate from one or more separate entity(ies) that was an Affiliate when the transfer took place; and (2) will continue Financial Products activity of the same type as the Affiliate.
<b>State</b>	Any of the 50 U.S. states, the District of Columbia, or territory of the United States (Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, and Northern Mariana Islands).
<b>State-Insured Credit Unions</b>	Credit unions that are regulated by or have insurance for their member accounts from a State Agency or instrumentality.
<b>Subsidiary</b>	A company that is owned or Controlled directly, or indirectly, by another company.

## Key Terms for Identifying Financial Products and Financial Services Activity That Can Be Used to Meet the CDFI Certification Requirements

### Eligible Financial Products Types



#### **[CLARIFYING UPDATE 07/05/2025]**

Financial Products is defined by the CDFI Fund in the CDFI Program Revised Interim Regulations, 12 CFR 1805.104.

The CDFI Fund currently recognizes the following types of Financial Products for CDFI Certification purposes:

Term	Definition
<b>Loan</b>	A type of debt in which a lender transfers funds to a borrower with the expectation of repayment over time; loans to Certified CDFI(s) and emerging CDFI(s) only qualify as eligible Financial Products activity for CDFI Intermediaries.
<b>Equity Investment</b>	An investment made by a CDFI that, in the judgment of the CDFI Fund, supports or enhances activities serving the CDFI's Investment Area(s) or

Term	Definition
	<p>a Targeted Population(s). These investments must be made through an arms-length transaction with a third party that does not have a relationship with the CDFI as an Affiliate. Equity Investments may comprise a stock purchase, a purchase of a partnership interest, a purchase of a limited liability company membership interest, a loan made on such terms that it has sufficient characteristics of equity (and is considered as such by the CDFI Fund), a purchase of secondary capital, or any other investment deemed by the CDFI Fund to be an Equity Investment.</p>
<p>Forgivable Loan</p>	<p>There are two instances where forgivable loans can be considered eligible Financial Products:</p> <ul style="list-style-type: none"> <li>a) A forgivable loan with at least one payment within twelve (12) months of the loan closing date; or</li> <li>b) A forgivable loan that meets each of the following seven (7) conditions:                             <ul style="list-style-type: none"> <li>i. Purpose of the debt is for the purchase of a single-family, owner-occupied residence and is in a subordinate position;</li> <li>ii. Debt is subject to a credit contract requiring repayment if certain terms specified in the contract are not met and full forgiveness of the loan may not be made until the end of the loan period. The creditor has verified that the borrower has sufficient income or assets (other than the value of the property being purchased) to repay the debt according to its terms;</li> <li>iii. Loan term of five (5) years or longer;</li> <li>iv. Borrower has pledged adequate security;</li> <li>v. Debt is documented by a valid and enforceable promissory note, and security interests are properly perfected;</li> <li>vi. Interest (even a nominal amount) is charged at least annually (may be accrued and capitalized); and</li> <li>vii. Debt is reflected as a loan on the creditor’s balance sheet.</li> </ul> </li> </ul>
<p>Loan Guarantee</p>	<p>A promise by a party to assume a debt obligation of a borrower if the borrower defaults, for which related funds have been officially reserved/set aside on the guaranteeing entity's balance sheet as capital available to cover the loan guarantee transaction.</p>
<p>Loan Purchase</p>	<p>The purchase of a loan originated and disbursed by another entity can only be counted towards meeting the CDFI Certification Target Market benchmark or the Native American CDFI designation activity benchmarks if:</p>

Term	Definition
	<ul style="list-style-type: none"> <li>a) for the general CDFI Certification only, the loan was purchased from a Certified CDFI and the purchasing entity has a Certified CDFI market component in, as applicable, its CDFI Certification Target Market or collective review market; or</li> <li>b) for the general CDFI Certification or the Native American CDFI designation, when the purchased loan was originally closed, it was directed to a market component(s) in, as applicable, the purchasing entity's CDFI Certification Target Market, collective review market, or Native American CDFI designation-related Native Communities market.</li> </ul>
Credit Card	A revolving line of credit that facilitates both consumer and commercial business transactions, including purchases and cash advances, where the borrower is required to make payments in accordance with the terms set forth in the cardholder agreement.; does not include debit transactions or prepaid cards.
Line Of Credit	An arrangement between a creditor and a customer that establishes the maximum loan amount the customer can borrow.
Debt With Equity Features	Debt financing that may be converted to equity upon meeting specified conditions.
Debt with Royalties	A loan that has a royalty participation giving the investor/lender the right to a percentage of the company's sales or profits.
Participations	The sharing or selling of interests in a financing transaction (if a participation takes the form of a buy-in or the purchase of all or a share of a financing transaction — that is, if an entity participates in a financing transaction, but not as a financing entity of record when the relevant transaction was originated — it is only recognized as an eligible Financial Products by the CDFI Fund if it qualifies as a loan purchase).
For CDFI Intermediaries	Loans to Certified CDFI(s) or emerging CDFI(s) and deposits in Insured Credit Union CDFI(s) including emerging, or State-Insured Credit Union CDFI(s) as defined by <a href="#">12 CFR § 1805.104</a> .
Deferred Loan	A deferred loan with the payment due on sale, even if no other prior payment is made, is an eligible Financial Products and should be included in the activity presented with the Financing Entity and Target Market requirements for CDFI Certification. To be considered an eligible

Term	Definition
	Financial Products, a loan (including a deferred loan) must include an expectation of repayment, regardless of the timing of that repayment.

Unless otherwise allowed in a CDFI Certification provision, the only Financial Products activity accepted as eligible for CDFI Certification purposes is activity involving a CDFI Fund-approved Financial Products provided at arm's-length. Additionally, the entity claiming the activity must be named as a financing entity of record in the associated transaction closing documents.

All eligible Financial Products transactions originated by an entity during the timeframe under review for CDFI Certification purposes, typically an entity's most recently completed fiscal year, must be included in the Financial Products activity data assessed in the CDFI Certification Target Market test. The activity data should include transactions that no longer appeared or appear on the relevant entity's balance sheet as of the end of the relevant review timeframe or by the date the information is provided to the CDFI Fund (e.g., the transactions may have been transferred to another entity, sold or paid off, etc.).

For an entity to be certified as a CDFI, its eligible Financial Products activity and that of each Affiliate or other entity relevant to its CDFI Certification review that engages in eligible Financial Products activity must comply with all applicable standards for responsible financing practices established in the CDFI Certification Primary Mission criterion.

A request must be submitted to the CDFI Fund for specific recognition of any financing product not identified as an eligible Financial Products for CDFI Certification purposes. If there is any uncertainty about whether a financing product is an eligible Financial Products, clarification should be obtained from the CDFI Fund prior to submission of a CDFI Certification Application via submission of a help request in the CDFI Fund's the Awards Management Information System (AMIS).

The CDFI Fund does not currently accept the following examples of financing as eligible Financial Products types for CDFI Certification purposes: grants, forgivable loans that do not require at least one payment towards the outstanding principal or interest within 12 months following the loan closing date, factoring, overdraft protection, prepaid credit cards, debit transactions, and lease financing except where the purpose of the lease financing transaction is the direct provision of non-grant capital to a consumer to support lease payments (i.e., except when the lease financing is in fact a loan or an Equity Investment).

### **Eligible Financial Services Types**

Financial Services is defined by the CDFI Fund in the CDFI Program Revised Interim Regulations, 12 CFR Part 1805.104.

The CDFI Fund currently recognizes the following types of financial services for CDFI Certification purposes:

- Checking accounts;
- Savings accounts (includes money market accounts and certificates of deposit [cd(s)]);
- Check cashing;
- Money orders;

- Certified checks;
- Automated teller machines; and
- Safe deposit box services.

The only Financial Services activity that will be accepted as eligible Financial Service activity for CDFI Certification purposes and can be used to meet the CDFI Certification requirements is that involving a CDFI Fund-approved Financial Service type provided directly and at arm’s length by the entity claiming the activity, unless otherwise allowed in certain CDFI Certification provisions.

<b>NOTE</b>	Only deposits by a depository institution directly accepted from non-Affiliated third parties into depository accounts, including personal, commercial and trust accounts, will be recognized as eligible Financial Service activity, unless otherwise allowed in certain CDFI Certification provisions. The entity claiming to provide depository accounts must also hold the deposits made by consumers into the accounts. Helping consumers access accounts such as Individual Development Accounts (IDA[s]), child savings/development accounts (CSA(s)/CDFA(s)), etc., is not sufficient for an entity to claim that it offers depository accounts as a Financial Service.
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For depository accounts, like checking accounts, savings accounts, etc., personal, commercial and trust accounts are included as eligible Financial Service activity.

The CDFI Fund recognizes all of the above Financial Service types when provided by the entity claiming the activity directly and at arm’s-length or as otherwise allowed in certain CDFI Certification provisions as eligible Financial Service activity for the purpose of meeting the CDFI Certification requirements, except in the Target Market test. For the Target Market tests, only deposits from non-Affiliated third parties into depository accounts accepted directly by a depository institution will be recognized as eligible Financial Service activity, except as may be allowed in certain CDFI Certification provision. These depository accounts may include personal, commercial and trust accounts.

For an entity to be certified as a CDFI, its eligible Financial Service activity, and that of each Affiliate or other entity relevant to its CDFI Certification review that engages in eligible Financial Service activity, must comply with all applicable standards for responsible financing practices established in the CDFI Certification Primary Mission criterion.

Any financing service not clearly identified above must be specifically approved by the CDFI Fund as an eligible CDFI Certification Financial Service type before it can be included among an entity’s eligible Financial Service activity for the purposes of meeting the CDFI Certification requirements. If there is any uncertainty about whether a Financial Service aligns with the eligible Financial Service types shown above, clarification should be obtained from the CDFI Fund prior to submission of a CDFI Certification Application via submission of a help request in the CDFI Fund’s interactive online portal, the Awards Management Information System (AMIS).

## APPENDIX B. DEFINING CONTROL, CONTROLLED, AND CONTROLLING IN AFFILIATE RELATIONSHIPS

### [CLARIFYING UPDATE 07/05/2025]

When examining the definitions of Control, Controlled, or Controlling, Affiliates can be identified through an entity's stock certificate summary report, organizational documents, or governance documents (including bylaws, Articles of Incorporation, or similar records). Some common examples of Control outside of stock ownership include:

#### **Governing or Managing Board**

Control can exist at the governing or managing board level. If an Affiliate appoints, nominates, or occupies a majority or a substantial minority of seats on an entity's governing or managing board, it indicates that the Affiliate exercises Control over the entity's leadership.

#### **General Operations, Business Plan, and Budget**

Control can exist if an Affiliate plays an active role in an entity's operations, the development or implementation of its business plan, or its overall budget.

For example, an Affiliate may exert Control if it:

- Must approve the entity's operating plan, business plan, or overall budget;
- Actively influences what activities the entity undertakes; or
- Has decision-making authority over the entity's spending or fund allocation.

A passive role in an entity's operations—such as compliance oversight related to funding requirements—is not indicative of a Controlling relationship. Similarly, influence over a specific program, project, or limited set of funds does not constitute Control.

#### **Financing Decisions**

Control may exist if an Affiliate actively participates in:

- Deciding how or where Financial Products will be deployed, or
- Having veto power over any of an entity's underwriting or financing decisions.

Additionally, an Affiliate appointing, nominating, or occupying a majority or a substantial minority of seats on an entity's loan or investment committee can indicate Control.

A passive role—such as compliance-related funding oversight—is not indicative of a Controlling relationship.

#### **Staffing**

If an entity's staffing is provided by an Affiliate, either contractually or in practice, the Affiliate may have a Controlling influence over the entity's management.

## Substantial Minority Control via an Entity's Governing Board

A substantial minority Control of a board refers to when less than half of the total number of board members may act according to the authority of another entity, but the members collectively are still significant enough to influence the board's overall functioning and decisions.

The specific number constituting a substantial minority depends on board parameters, such as size, structure, and operational processes.

An Affiliate may exhibit Control over an entity's governing board even when occupying less than 50% of board seats if:

- Those seats hold special powers (e.g., veto authority, budget control); or
- The Affiliate occupies key board positions, (e.g., Board Chair, Nominating Committee members, Loan Committee members).

## APPENDIX C. CDFI CERTIFICATION APPLICATION CHECKLIST

Application Checklist Step	Complete
<p>Review the “Certification as a Community Development Financial Institution” and Definitions sections of the CDFI Program Revised Interim Regulations (12 CFR 1805), available on the CDFI Fund’s public website at <a href="http://cdfifund.gov">cdfifund.gov</a>. Note that capitalized words or phrases throughout the CDFI Certification Application are defined terms that can be found in the CDFI Program Interim Regulations, the Community Development Banking and Financial Institutions Act of 1994 (12 U.S.C. 4701 <i>et seq.</i>) or the most recent CDFI Fund Native American CDFI Assistance (NACA) Program Notice of Funds Availability (NOFA).</p>	<input type="checkbox"/>
<p>Review the Application and Application guidance materials provided on the CDFI Fund’s CDFI Certification webpage at <a href="http://cdfifund.gov">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</p>	<input type="checkbox"/>
<p>Create, <u>or</u> access an existing, System for Award Management (SAM) account to obtain or verify a Unique Entity ID (UEI) and complete a full SAM registration or, to update existing SAM information for the Applicant and, if applicable, for each other entity relevant to its CDFI Certification review (e.g., each Affiliate relevant to the Primary Mission review or each entity relevant to the CDFI Certification collective review process).</p> <p>Questions about SAM registration or the UEI should be directed to SAM.gov via contact information identified at the SAM.gov website. The CDFI Fund does not manage SAM.gov and is unable to respond to any related questions.</p>	<input type="checkbox"/>
<p>Set email systems and firewalls to accept messages generated by AMIS. Contact the AMIS Help Desk via an AMIS Service Request for assistance, if needed.</p>	<input type="checkbox"/>
<p>Create or review and, if needed, update the Applicant’s community development strategy either in a governing leadership-approved strategic plan or via a governing leadership-approved community development strategy narrative.</p> <p>Follow all applicable guidance or instructions related to entities relevant to the CDFI Certification review or on creating an Affiliates/related entities record for each such entity provided in the CDFI Certification Application Guidance manual available at <a href="http://cdfifund.gov">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div>	<input type="checkbox"/>

Application Checklist Step	Complete
<p>Determine if the Applicant needs to seek approval from the CDFI Fund for any currently non-allowed financing product/service, Targeted Population, practice or activity in order to meet the CDFI Certification requirements. See <a href="#">“Obtaining CDFI Certification-related determinations on new Financial Products Type(s), new Financial Services type(s), Amended responsible financing practice(s), new disregarded or included major use(s) of assets/staff time, new Targeted Population(s), and new/amended CDFI Certification Target Market Assessment Methodology(ies).”</a></p>	<input type="checkbox"/>
<p>Review guidance materials on how to access and use the CDFI Fund’s online portal, AMIS.</p>	<input type="checkbox"/>
<p>Create a new account for the Applicant in AMIS <u>or</u> review and, if needed, update data fields on the Organization page in an existing account.</p> <ul style="list-style-type: none"> <li>• Refer to the AMIS guidance materials on the CDFI Fund’s webpage.</li> </ul>	<input type="checkbox"/>
<p>Create a record for each Affiliate or other entity relevant to the Applicant’s CDFI Certification review in the Affiliate section of the Applicant’s AMIS account.</p> <ul style="list-style-type: none"> <li>• Includes each Affiliate relevant to the Primary Mission review or each entity relevant to the CDFI Certification collective review process (may include certain entities that are not directly relevant to the Applicant’s CDFI Certification review but are being presented as Controlling entities providing accountability to an entity[ies]).</li> <li>• Refer to the AMIS guidance materials on the CDFI Fund’s webpage.</li> </ul>	<input type="checkbox"/>
<p>Create a new account in AMIS for each Affiliate or other entity relevant to the Applicant’s CDFI Certification collective review process, including those being presented as Controlling entities providing accountability to an entity[ies], or review and, if needed, update data fields on the Organization page in an existing account.</p> <ul style="list-style-type: none"> <li>• Refer to the AMIS guidance materials located on the CDFI Fund’s webpage.</li> <li>• Follow all applicable guidance or instructions related to entities relevant to the CDFI Certification review or on creating an Affiliates/related entities record for each such entity provided in the CDFI Certification Application Guidance manual available at <a href="#">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</li> </ul>	<input type="checkbox"/>
<p>Create a CDFI Certification market record(s) in the CDFI Certification Market section of the Applicant’s AMIS account to represent the Applicant’s CDFI Certification Target Market and, if applicable, its Native American CDFI designation market.</p> <ul style="list-style-type: none"> <li>• Follow all applicable guidance or instructions related to CDFI Certification Target Market and Native American CDFI designation markets or on creating a CDFI Certification market record provided in the CDFI Certification Application Guidance manual available at <a href="#">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</li> </ul>	<input type="checkbox"/>

Application Checklist Step	Complete
<p>Create a CDFI Certification market record(s) in the CDFI Certification Market section of the AMIS account for each Affiliate or other entity relevant to the Applicant’s CDFI Certification collective review process (may include certain entities that are not directly relevant to the Applicant’s CDFI Certification review, but are being presented as Controlling entities providing accountability to an entity[ies] that is relevant to the collective review) to represent the CDFI Certification collective review Target Market component(s) that the other entity(ies) will use for the Target Market and Accountability tests.</p> <ul style="list-style-type: none"> <li>Follow all applicable guidance or instructions related to CDFI Certification collective review Target Markets for entities relevant to the Applicant’s CDFI Certification collective review process or on creating a CDFI Certification market record provided in the CDFI Certification Application Guidance manual available at <a href="http://cdfifund.gov">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</li> </ul>	<input type="checkbox"/>
<p><u>If a Transaction Level Report (TLR) for the Applicant or, if applicable, for each entity relevant to the Applicant’s CDFI Certification collective review process that reflects all eligible Financial Products and, if elected and allowed, all applicable eligible Financial Services activity for what is the most recently completed fiscal year as of when the CDFI Certification Application is submitted has not been submitted with CDFI Fund CDFI/NACA Program funding:</u></p> <ul style="list-style-type: none"> <li>If the relevant entity has active CDFI/NACA Program funding for which a TLR is required, create and submit a funding-related TLR for the Applicant or, if applicable and needed, for each entity relevant to the Applicant’s CDFI Certification collective review process to provide the relevant data.</li> <li>If the relevant entity does not have any active CDFI/NACA Program funding that requires a TLR, create and submit a CDFI Certification-related TLR for the Applicant or, if applicable and needed, for each entity relevant to the Applicant’s CDFI Certification collective review process to provide the relevant data.</li> </ul> <p>If approval of any currently non-allowed financing product/service, Targeted Population, practice or activity needed to meet the CDFI Certification requirements is being sought, do not certify the TLR(s) until a determination has been received with all such requests.</p> <p>After submitting the TLR, the Applicant must run the Target Market Calculator to see if the Applicant meets the Target Market Activity thresholds to submit the CDFI Certification Application. If the results of the Target Market Calculator show “PASS” and the Applicant does not want to make any changes to its TLR records, then the Applicant must certify their TLR. The submission of the CDFI Certification Application requires a certified TLR submission.</p>	<input type="checkbox"/>
<p>If seeking approval of a new Targeted Population(s), create a map(s) in the CDFI Fund’s CIMS system to identify the geography for each Other-OTP Target Market component. Follow all applicable guidance or instructions related to new Targeted Populations or on creating a CIMS map provided in the CDFI Certification Application Guidance manual</p>	<input type="checkbox"/>

Application Checklist Step	Complete
<p>available at <a href="https://www.cdfifund.gov">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</p>	
<p>Create a CDFI Certification Application in AMIS.</p>	<input type="checkbox"/>
<p>As needed, submit a request(s) to the CDFI Fund for approval of any non-allowed financing product/service, Targeted Population, practice, or activity needed to meet the CDFI Certification requirements.</p> <p>Follow all applicable guidance or instructions related to CDFI Certification-related special determination requests provided in the CDFI Certification Application Guidance manual available at <a href="https://www.cdfifund.gov">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</p>	<input type="checkbox"/>
<p>If applicable, review the CDFI Fund determination(s) on the request(s) to include non-allowed Financing Product/Service, Targeted Population, practice, or activity needed to meet the CDFI Certification requirements; then re-assess Applicant’s eligibility for CDFI Certification and determine if and how to proceed with the CDFI Certification Application.</p>	<input type="checkbox"/>
<p>If needed, create a CIMS map in AMIS for each customized Investment Area included in either the Applicant’s CDFI Certification Target Market or, if applicable, included as a Target Market component for each entity relevant to the Applicant’s CDFI Certification collective review process to identify the associated geography, to validate it as an Investment Area and to assess if an acceptable level of Financial Products activity has been directed to the qualified census tract(s)/county(ies) in the relevant geography for activity directed to non-qualified tract(s)/county(ies) in the area to be accepted as Target Market-directed. If a CIMS map is not created in AMIS, or analysis demonstrates that the geography is not eligible, the respective Target Market component will not be approved.</p> <p>Follow all applicable guidance or instructions related to Customized Investment Areas or on creating a CIMS map provided in the CDFI Certification Application Guidance manual available at <a href="https://www.cdfifund.gov">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</p>	<input type="checkbox"/>
<p>As applicable, create or review and, if needed, update an advisory board policy for the Applicant or, if applicable, each entity relevant to the Applicant’s collective review process that is using an advisory board for CDFI Certification Accountability purposes (may include certain entities that are not directly relevant to the Applicant’s CDFI Certification review, but are being presented as Controlling entities providing accountability to an entity[ies] that is relevant to the collective review).</p> <ul style="list-style-type: none"> <li>Follow all applicable guidance or instructions related to advisory board policies provided in the CDFI Certification Application Guidance manual available at <a href="https://www.cdfifund.gov">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</li> </ul>	<input type="checkbox"/>

Application Checklist Step	Complete
<p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p>	
<p>As applicable, create or review and, if needed, update a board member recusal policy for the Applicant or, if applicable, each entity relevant to the Applicant’s collective review process for which such a policy is needed for CDFI Certification Accountability purpose. This may include certain entities that are not directly relevant to Applicant’s CDFI Certification review, but are being presented as Controlling entities providing accountability to an entity(ies) that is relevant to the collective review).</p> <ul style="list-style-type: none"> <li>Follow all applicable guidance or instructions related to board member recusal policies provided in the CDFI Certification Application Guidance manual available at <a href="https://www.cdfifund.gov">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</li> </ul> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p>	<input type="checkbox"/>
<p>Create a CIMS map(s) in AMIS if any member of the board(s) used as a means of Accountability by either the Applicant, or any entity relevant to the Applicant’s collective review process, is being presented as accountable via a source(s) of Accountability requiring a CIMS map to demonstrate its validity. Entities relevant to the collective review process may include a Controlling entity providing accountability to an entity[ies] that is part of the collective review process, including for general CDFI Certification or, if applicable for the Applicant, in connection with the Native American CDFI designation.</p> <ul style="list-style-type: none"> <li>Follow all applicable guidance or instructions related to sources of Accountability or on creating a CIMS map provided in the CDFI Certification Application Guidance manual available at <a href="https://www.cdfifund.gov">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</li> </ul>	<input type="checkbox"/>
<p>Create board, board member, and accountable board member records in AMIS to present Accountability information in connection with the general CDFI Certification for the Applicant and, if applicable, for each entity relevant to the Applicant’s CDFI Certification collective review process (may include certain entities that are not directly relevant to the Applicant’s CDFI Certification review, but are being presented as a Controlling entity providing accountability to an entity[ies] that is) or, if needed, to present the Applicant’s Accountability information in connection with the Native American CDFI designation.</p> <ul style="list-style-type: none"> <li>Follow all applicable guidance or instructions related to Accountability or on creating a board, board member, and accountable board member records</li> </ul>	<input type="checkbox"/>

Application Checklist Step	Complete
<p>provided in the CDFI Certification Application Guidance manual available at <a href="https://cdfifund.gov">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>.</p>	
<p>If a Transaction Level Report (TLR) was created specifically for CDFI Certification Application purposes for the Applicant or, if applicable, for each entity relevant to the Applicant’s CDFI Certification collective review process and, if applicable, a determination has been received from the CDFI Fund in connection with all requests for approval of any currently non-allowed financing product/service, Targeted Population, practice or activity needed to meet the CDFI Certification requirements, ensure that the data in all such TLRs correctly reflects all eligible financial product and, if elected and allowed, all applicable eligible financial services activity for what is the most recently completed fiscal year as of when the CDFI Certification Application is submitted.</p>	<input type="checkbox"/>
<p>Complete and submit the full CDFI Certification Application in AMIS. Upon submission of the CDFI Certification Application, the Applicant’s contacts identified in AMIS will receive notification that the Application has been received.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><b>NOTE:</b> CDFI Certification Applicants must follow the detailed CDFI Certification Application instructions provided in the CDFI Certification Application Guidance manual (available at <a href="https://cdfifund.gov">CDFI Certification - Apply   Community Development Financial Institutions Fund (cdfifund.gov)</a>) to properly complete an Application.</p> <p><b>NOTE:</b> CDFI Certification Applications, including supporting documents, must be prepared using the English language, and financial information must be in U.S. dollars. Translated documentation must be submitted with the original non-English document(s) that includes, if needed, evidence of governing leadership approval.</p> </div>	<input type="checkbox"/>
<p>Review and sign the CDFI Certification Agreement, if approved for CDFI Certification. An Authorized Representative must electronically review, sign, and return the CDFI Certification Agreement within 30 business days via AMIS. A copy of the executed Agreement will be available in the AMIS account for reference.</p>	<input type="checkbox"/>